

## EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LIFE AFTER HATE, INC.,  
a/k/a EXITUSA, ) Docket No. 18 C 06967  
Plaintiff, )  
v. ) Chicago, Illinois  
FREE RADICALS PROJECT INC. and ) February 23, 2019  
CHRISTIAN PICCIOLINI, ) 11:05 a.m.  
Defendants. )

VOLUME 2

TRANSCRIPT OF PROCEEDINGS - PRELIMINARY INJUNCTION HEARING  
BEFORE THE HONORABLE VIRGINIA M. KENDALL

APPEARANCES:

For the Plaintiff:

SAPER LAW OFFICES LLC by  
MS. DALIAH SAPER  
MR. MATTHEW RICHARD GROTHOUSE  
MR. CHRIS MONACO  
505 North LaSalle Street, Suite 350  
Chicago, Illinois 60654

For the Defendants:

SAUL EWING ARNSTEIN & LEHR LLP by  
MR. EUGENE J. GEEKIE, JR.  
MR. JOSEPH MING KUO  
MS. KELLIE Y. CHEN  
MR. MICHAEL A. JACOBSON  
161 North Clark Street, Suite 4200  
Chicago, Illinois 60601

Court Reporter:

GAYLE A. MCGUIGAN, CSR, RMR, CRR  
Federal Official Court Reporter  
219 South Dearborn, Room 2318-A  
Chicago, Illinois 60604  
(312) 435-6047  
Gayle\_McGuigan@ilnd.uscourts.gov

INDEX

WITNESS	PAGE
CHRISTIAN PICCIOLINI	
Direct (Resumed) By Ms. Saper .....	237
Cross By Mr. Geekie .....	283
Redirect By Ms. Saper .....	327
Recross By Mr. Geekie .....	346
Further Redirect By Ms. Saper .....	347
TONY McALEER	
Direct By Ms. Saper .....	349

APPEARANCES: (Continued)

For Co-Defendants  
and Third-Party  
Defendants:

PRETZEL & STOUFFER CHTD by  
MR. JAMES JOSEPH SIPCHEN  
One South Wacker Drive, Suite 2500  
Chicago, Illinois 60606-4673

(Proceedings heard in open court:)

THE CLERK: 18 C 6967, Life After Hate versus Free  
Radicals Project.

THE COURT: Okay, folks. Are you ready to pick up  
where you left off?

All right. Let's have you all put your names on the  
record again because we do that each morning.

So we'll go around the table, please.

MS. SAPER: Good morning, your Honor. Daliah Saper on  
behalf of plaintiff, Life After Hate.

THE COURT: Good morning.

MR. GROTHOUSE: Good morning, your Honor. Matt  
Grothouse on behalf of plaintiff.

THE COURT: Good morning.

MR. McALEER: Tony McAleer.

MR. RANGEL: Sammy Rangel.

MR. MONACO: Good morning, your Honor. Chris Monaco  
on behalf of plaintiff.

MR. SIPCHEN: Good morning, your Honor. Jim Sipchen  
for the counter-defendant, third-party defendant.

THE COURT: Okay. Good morning, folks.

MR. GEEKIE: Good morning. Gene Geekie on behalf of  
the defendants.

MR. PICCIOLINI: Good morning, your Honor. Christian  
Picciolini.

1 MR. SCHULTIS: Christopher Schultis, paralegal.  
 2 MR. KUO: Joe Kuo on behalf of defendants.  
 3 MS. CHEN: Kellie Chen on behalf of the defendants.  
 4 THE COURT: Okay. Good morning, everyone.  
 5 Now let's get started.  
 6 I think you were on the stand, right?  
 7 So come on and take the stand again.  
 8 (Witness resumes the stand.)  
 9 THE COURT: Since we've had the break from the  
 10 weekend, please raise your right hand.  
 11 (Witness duly sworn.)  
 12 THE COURT: All right. Have a seat.  
 13 And you can pick up when he is all settled where you  
 14 left off.  
 15 MS. SAPER: I'll wait for Mr. Monaco to set up his --  
 16 the exhibits on the --  
 17 THE COURT: Oh, right. Okay.  
 18 Just remind me if it's HDMI or VGA.  
 19 MR. MONACO: It will be HDMI, your Honor.  
 20 THE COURT: Very well.  
 21 MS. SAPER: Is this showing on your screens? Okay.  
 22 It's not showing on the big one.  
 23 THE COURT: Oh, it's not showing on yours?  
 24 MS. SAPER: No.  
 25 THE COURT: Everything else is on, so I don't know --

1 A Correct.  
 2 Q Okay. And he ultimately did return the domains and the  
 3 YouTube accounts to you; is that correct?  
 4 A Yes. To my personal account.  
 5 Q And by "personal account," you mean the Life After Hate  
 6 GoDaddy hosting account; is that correct?  
 7 A There were two personal GoDaddy accounts that I owned, one  
 8 which was for my businesses, and one which I ran for --  
 9 attached to my Life After Hate email.  
 10 Q And you primarily handled the account setups and domain  
 11 purchases for Life After Hate, the Illinois non-profit; is that  
 12 correct?  
 13 A For the Illinois non-profit, yes. And I believe I also did  
 14 for the Wisconsin corporation.  
 15 Q And you would call yourself tech savvy; is that correct?  
 16 A I don't know exactly what you mean by "tech savvy," but I  
 17 can register domain names, I can build websites on online  
 18 website builders, but other than that ...  
 19 Q You've dozed -- you've designed dozens and dozens of  
 20 websites; is that correct?  
 21 A Yes.  
 22 Q Okay. And you set up all of the ExitUSA social media  
 23 accounts for Life After Hate as well; is that correct? The  
 24 non-profit.  
 25 A Yes, for Life After Hate. I believe I set up most of

Picciolini - Direct (Resumed) by Saper

1 if you look at that one on -- that shows you what everyone is  
 2 seeing. Okay?  
 3 MR. MONACO: Thank you, your Honor.  
 4 DIRECT EXAMINATION (Resumed)  
 5 BY MS. SAPER:  
 6 Q Okay, Christian, good morning.  
 7 A Good morning.  
 8 Q Last -- on Friday we started the conversation, we'll call  
 9 it that, with your termination of Arno. And I directed you to  
 10 Exhibit 1, which -- which discussed your requesting Arno return  
 11 the YouTube account and some of the domains and social media  
 12 assets back to the organization.  
 13 Do you remember that?  
 14 A I do remember this email, yes.  
 15 Q And you asked Arno to remove his own videos from the Life  
 16 After Hate YouTube account.  
 17 Do you remember doing that?  
 18 A Yes. There were videos of him giving speaking engagements,  
 19 yes.  
 20 Q And you asked him to remove them because they would be  
 21 confusing if they remained on the Life After Hate organization  
 22 account; is that correct?  
 23 A I believe so, yes.  
 24 Q And you didn't want his name attached to the organization  
 25 because he was fired for misconduct; is that correct?

Picciolini - Direct (Resumed) by Saper

1 those. Arno, I believe, set up some. And then for ExitUSA, I  
 2 also set up the social media profiles.  
 3 THE COURT: Okay. Stop right there, please.  
 4 So who do you have in the back?  
 5 Do you have Mr. Velazquez-Batista?  
 6 Just hold on a second because I need a defense  
 7 attorney is what I need. And a prosecutor, right?  
 8 THE CLERK: Yes.  
 9 THE COURT: Okay. So are you on this? On  
 10 Velazquez-Batista?  
 11 UNIDENTIFIED SPEAKER: I'm the arresting --  
 12 THE COURT: Oh, okay. All right. So are you on  
 13 Velazquez-Batista?  
 14 UNIDENTIFIED SPEAKER: I'm the AUSA --  
 15 THE COURT: Okay. Do you have a defense attorney? Do  
 16 you know who it is?  
 17 UNIDENTIFIED SPEAKER: She's on her way, about five  
 18 minutes. And the interpreter is on his way.  
 19 THE COURT: Okay. All right. So just hold on tight.  
 20 Thank you very much.  
 21 COURT SECURITY OFFICER: All right.  
 22 THE COURT: Sorry about that.  
 23 Go ahead.  
 24 MS. SAPER: What was the last thing I asked?  
 25 THE COURT: Here. I can go to it.

1 (Reading:) Okay. And you set up all the ExitUSA  
2 social media accounts for Life After Hate as well; is that  
3 correct? The non-profit.  
4 (Reading:) Yes, for Life After Hate. I believe I set  
5 up most of those. Arno, I believe, set up some. And then for  
6 ExitUSA, I also set up the social media profiles.  
7 MS. SAPER: Great.  
8 BY MS. SAPER:  
9 Q After you disassociated or terminated from the Illinois  
10 non-profit Life After Hate, you deactivated or disabled the  
11 Life After Hate Facebook account in November of 2017; is that  
12 correct?  
13 A The way that Facebook groups are set up is they're tied to  
14 your personal account so they're not independent of each other  
15 And when I was terminated, I unlinked those pages from my  
16 personal account.  
17 Q Did you unlink them or delete them?  
18 A I unlinked them.  
19 Q By -- by unlinking them, in your words, did the account  
20 become inaccessible?  
21 A I don't know.  
22 MR. GEEKIE: Objection. Foundation, your Honor.  
23 THE COURT: Okay. So if you can lay the foundation,  
24 you can ask that question.  
25 BY MS. SAPER:

1 Q So you just testified that you had access to the Life After  
2 Hate Facebook account; is that correct?  
3 A Yes, I did, among other people as well.  
4 Q And so you shared access -- administrative access to the  
5 Life After Hate account; is that correct?  
6 A Yes.  
7 Q And so you stated that you deleted that account after you  
8 left in November because you were cleaning up your -- why did  
9 you delete that account?  
10 A I said I unlinked it. I didn't say I deleted it.  
11 I was no longer with the organization. I was moving  
12 on. And it didn't make sense for me to have access to it  
13 anymore.  
14 Q Okay. I'm going to -- I'm going to look -- I'm looking at  
15 the deposition transcript. And if you would like to look at  
16 that in that deposition transcript, which is -- I don't know  
17 which number it is. Fifty-something. This is an exhibit.  
18 Page 177.  
19 (Counsel conferring.)  
20 BY MS. SAPER:  
21 Q Okay. So in the deposition, I asked you if you recall  
22 disabling the page, and then the word "delete" was used.  
23 I'll give you a second to review it.  
24 Is it still your testimony that you unlinked or that  
25 you deleted the page?

1 MR. GEEKIE: Objection. That's improper attempted  
2 impeachment through deposition transcript.  
3 And it isn't what it says, your Honor.  
4 THE COURT: Okay. Whose deposition do we have?  
5 MS. SAPER: Mr. Picciolini's.  
6 THE COURT: Why is that improper?  
7 MR. GEEKIE: Because she didn't read the question and  
8 answer to him, your Honor.  
9 THE COURT: Okay. So it's improper format, not  
10 improper impeachment, though.  
11 MR. GEEKIE: Well --  
12 THE COURT: Okay. So I'm going to give a little  
13 primer on it because this is what I like to do to make sure  
14 everyone knows how.  
15 Ask him the question.  
16 He gives you the answer.  
17 And then you have to juxtapose the question that he  
18 gave and make sure that he knows he's under oath.  
19 But take a break because I think we've got everyone  
20 now for my arraignment. Okay?  
21 Sir, you can step down for just a moment while I take  
22 care of a criminal matter. All right?  
23 Thank you.  
24 (Judge Kendall attends to other matters.)  
25 THE COURT: All right, folks. Let's pick up where we

1 left off and bring you back to the witness stand.  
2 Sorry for the disruptions.  
3 (Witness resumes the stand.)  
4 THE COURT: So here's a little trick about impeachment  
5 and refreshing recollection.  
6 When someone is helpful to you, then you refresh their  
7 recollection by saying, "Do you recall." And then you can use  
8 whatever you want to show them.  
9 If you're impeaching, you don't show them. You just  
10 ask the question, and then you impeach with the cite.  
11 So let's try that again, and we'll go back to where we  
12 were.  
13 And that will be the last time I give some advice on  
14 it, okay?  
15 MS. SAPER: Hopefully I take it correctly and execute  
16 correctly.  
17 THE COURT: Okay. So ask the question that you want  
18 to impeach on first.  
19 BY MS. SAPER:  
20 Q All right. Mr. Picciolini, you testified that you merely  
21 delinked the Face -- Life After Hate Facebook page from your  
22 own accounts; is that correct?  
23 A Yes, that's correct.  
24 I'm not seeing the exhibit. Is that --  
25 Q There's no exhibit.

1 A All right.  
 2 Q Just asking you that question.  
 3 Mr. Picciolini, do you remember giving a deposition at  
 4 my offices on February 8th I believe was the date?  
 5 A I believe that was the date also.  
 6 Q Yes, February 8th.  
 7 Do you remember giving a deposition at my office  
 8 February 8th?  
 9 A Yes.  
 10 Q Okay.  
 11 (Counsel conferring.)  
 12 BY MS. SAPER:  
 13 Q All right. I'm showing you what I've marked as Exhibit  
 14 Number -- Exhibit Number 59, for lack -- just to make sure we  
 15 have a number.  
 16 (Counsel conferring.)  
 17 BY MS. SAPER:  
 18 Q 61.  
 19 Okay. In the deposition I asked you if you had  
 20 disabled the page.  
 21 And then you stated: "If I recall correctly, it was  
 22 tied to my personal account because that's how Facebook pages  
 23 work. And I think I went through and deleted a bunch of pages  
 24 that I was no longer using. I don't know if it correlates to  
 25 that date, but I do recall at one point."

1 And then we continued.  
 2 So do you -- is it still your testimony that you  
 3 delinked? Or that you deleted the Facebook page?  
 4 A Delinked. There were some other pages that I was using  
 5 that I may have deleted, but that wasn't one of them.  
 6 Q All right. Around that time, you also forwarded the  
 7 ExitUSA.org domain to ChristianPicciolini.com; is that correct?  
 8 A That is correct, yes.  
 9 Q And then you also registered a domain Exit.US; is that  
 10 correct?  
 11 A That is correct.  
 12 Q Did Exit.US also forward to ChristianPicciolini.com?  
 13 A I don't recall.  
 14 Q Around that time, which is November of 2017, you filed a  
 15 trademark registration for ExitUSA; is that correct?  
 16 A Yes, that's correct. I believed that it was my  
 17 intellectual property.  
 18 Q I'm showing you what I've marked as Exhibit 10.  
 19 Exhibit 10 is a copy of the entire prosecution history  
 20 of your ExitUSA trademark application.  
 21 Do you remember -- you've already testified that you  
 22 remember filing the trademark application; is that correct?  
 23 A Yes.  
 24 Q Do you recognize this document?  
 25 A I don't believe I've seen this before.

1 Q Okay. Do you remember what date of first use you submitted  
 2 for the trademark application?  
 3 A I don't.  
 4 Q Okay. I'm going to direct you to the first use date on  
 5 this document, which is a public document procured from the  
 6 United States Patent and Trademark Office. So the foundation I  
 7 don't believe needs to be laid because it is acquired through a  
 8 public source.  
 9 MR. GEEKIE: Can I have a second to look at it, your  
 10 Honor?  
 11 THE COURT: Sure.  
 12 MR. MONACO: Do you want me to zoom in a little?  
 13 MR. GEEKIE: Can you show me the top? Zoom out a  
 14 little bit.  
 15 MS. SAPER: Make it bigger.  
 16 MR. KUO: Scroll down.  
 17 MR. GEEKIE: Scroll down.  
 18 This would appear to be a government document, your  
 19 Honor. But we object to examining the witness about it because  
 20 he's never seen it before.  
 21 THE COURT: Okay. So the proper objection -- or the  
 22 proper procedure now is since he said he doesn't recall is  
 23 to -- is whether something would refresh his memory. So you  
 24 can try again.  
 25 Sustained.

1 BY MS. SAPER:  
 2 Q Okay, Christian, I'd like you to look at the --  
 3 THE COURT: No, no, no, no. You can't look at  
 4 something unless you -- it would refresh his memory.  
 5 MS. SAPER: Okay.  
 6 BY MS. SAPER:  
 7 Q Would it -- would it refresh your memory if I showed you  
 8 your signature page on the trademark application?  
 9 A I don't know that showing my signature page would refresh  
 10 my memory on the date.  
 11 Q Okay. I'd like to resubmit the document to confirm --  
 12 well, can I -- I'd like to show you the last page of the  
 13 document.  
 14 THE COURT: Okay. But he says it's not going to help  
 15 refresh his memory, and so you now have a document and he's not  
 16 giving you what you want, and so you can't use it again.  
 17 You can -- it's admitted. You can tell me the date.  
 18 But you can't use it with him anymore.  
 19 MS. SAPER: Okay. So, your Honor, I'd like to move  
 20 this trademark application into evidence as a public document.  
 21 THE COURT: Okay. Any objection?  
 22 MR. GEEKIE: No, your Honor.  
 23 THE COURT: Okay. It's in.  
 24 (Said exhibit received in evidence.)  
 25 BY MS. SAPER:

1 Q Okay. So, Christian, when you were filing trademark  
2 application, you had to do two things. You had to state a date  
3 of first use.  
4 Do you remember that?  
5 A I don't recall what my conversation was with my attorney at  
6 the time.  
7 Q You stated that your date of first use was in April of  
8 2014 -- of 2015.  
9 Do you remember that?  
10 A No, I do not.  
11 Q I'm sorry, 2014.  
12 Do you remember what specimen you submitted when you  
13 submitted the application --  
14 COURT REPORTER: Repeat the question, please.  
15 BY MS. SAPER:  
16 Q Do you remember what specimen of use you used when you  
17 submitted your trademark application?  
18 A I don't remember which one exactly.  
19 Q I'm going to now refer back to Exhibit 10, the last page of  
20 Exhibit 10.  
21 Christian, do you recognize what this screenshot is  
22 of?  
23 A Yes.  
24 Q Is it a screenshot of your website, specifically  
25 ChristianPicciolini.com\ExitUSA?

1 A Yes, it appears to be.  
2 Q And is this a website that you created?  
3 A No. I did not create my website.  
4 Q Did you commission a software company to create this  
5 website for you?  
6 A I commissioned a web design company to --  
7 Q Sure.  
8 And besides the web design company and yourself, did  
9 anyone else have access to this website?  
10 A Yes, I believe that others at the web design firm had all  
11 sorts of design access, content, uploading access.  
12 Q But besides the web design company and its employees, you  
13 were the only external party that had control and ability to  
14 update this website; is that correct?  
15 A I can only speak for myself. I did have access. Outside  
16 of me, I don't know who the design company gave access to  
17 Q But to your knowledge, outside of the design company, you  
18 were the only one who has administrative access and ability to  
19 update your own ChristianPicciolini.com website; is that  
20 correct?  
21 A To my knowledge, yes.  
22 Q Okay. And so this is an accurate depiction of what you  
23 submitted to the trademark office of your website  
24 ChristianPicciolini.com\ExitUSA.  
25 MR. GEEKIE: Objection. Foundation.

1 THE COURT: Okay. Sustained for foundation.  
2 MS. SAPER: I believe he identified the document as  
3 his website, your Honor.  
4 THE COURT: I just sustained for foundation, so re-lay  
5 the foundation.  
6 MS. SAPER: All right.  
7 BY MS. SAPER:  
8 Q Mr. Picciolini, is this a screenshot from your  
9 ChristianPicciolini.com\ExitUSA website?  
10 A It may have been from one point in time, but it's certainly  
11 not the case now.  
12 Q Okay. So at that point in time, it did look like this.  
13 A I said it certainly could have been. I don't recall.  
14 Q Okay.  
15 MS. SAPER: And just so the Court recognizes this as a  
16 part of the public record and the application submitted to the  
17 United States Trademark Office.  
18 THE COURT: Okay. So then you say so, then it's part  
19 of Exhibit --  
20 MS. SAPER: Ten.  
21 THE COURT: Okay.  
22 MS. SAPER: Which is I believe -- if I haven't, I'd  
23 like to move it into evidence, your Honor.  
24 THE COURT: I thought you just did.  
25 MS. SAPER: I thought I did, too.

1 BY MS. SAPER:  
2 Q All right. After you filed the trademark application, you  
3 held yourself out as founder of ExitUSA, a different  
4 organization -- Life After Hate -- that correct --  
5 COURT REPORTER: Repeat the question.  
6 MS. SAPER: I'll go slower.  
7 BY MS. SAPER:  
8 Q After you filed the trademark application, you held  
9 yourself out as the founder of ExitUSA, a different  
10 organization than Life After Hate; is that correct?  
11 A Life --  
12 MR. GEEKIE: Objection. Foundation, Judge, as to  
13 the -- after he filed the trademark application.  
14 THE COURT: Okay. Overruled. I have the date now.  
15 BY THE WITNESS:  
16 A Can you ask the question again? I'm sorry.  
17 BY MS. SAPER:  
18 Q Did you hold yourself out as the founder of ExitUSA around  
19 the time or after the time you filed your trademark application  
20 for ExitUSA?  
21 A I believe I've always held myself out as the founder of  
22 ExitUSA. And I don't know that that expired.  
23 Q When you give presentations or when you gave presentations  
24 after your disassociation from Life After Hate, did you  
25 identify that you were no longer associated with Life After

1 Hate or ExitUSA in your public speaking and presentations?  
 2 A Yes. My bios were updated to reflect that I had started a  
 3 new organization called Free Radicals Project. The only thing  
 4 that my bio would have said in regard to Life After Hate is  
 5 that I was a cofounder of those organizations.  
 6 Q I'm going to submit to you Exhibit Number 34, show you  
 7 Exhibit Number 34.  
 8 Do you remember speaking at a conference called  
 9 UFUNGU? I'm sorry if I'm not pronouncing it correctly.  
 10 A Yes.  
 11 Q And did you ask to speak at UFUNGU when you were a member  
 12 of or associated with Life After Hate?  
 13 A I don't recall the date of that talk specifically, but I  
 14 would have only done that if I was a part of the organization  
 15 at the time.  
 16 Q And then this conference was in November of 2017, wasn't  
 17 it?  
 18 A I don't know the date of it.  
 19 Q And if you look at Exhibit 34, does this look like the bio  
 20 that you submitted to the conference?  
 21 A It looks like a bio I would have submitted probably a year  
 22 before when -- if you say it was November '17, I probably would  
 23 have submitted it a year before it was booked because my  
 24 engagements typically book out about a year in advance. It's  
 25 also not a website that I created, so I didn't have any control

1 over the fact of what they put on there.  
 2 Q And your bio states that you're with ExitUSA and Life After  
 3 Hate.  
 4 Did you call or ask them to correct your bio to  
 5 clarify your current affiliation, or lack thereof, with Life  
 6 After Hate or ExitUSA?  
 7 A I'm not aware that this website existed. This is the first  
 8 time that I'm seeing this. But I did inform everybody that I  
 9 spoke to in front of that I was no longer with the  
 10 organization, yes.  
 11 Q Okay. I'm going to show you what I've marked as  
 12 Exhibit 46.  
 13 Do you remember speaking for the Anti-Defamation  
 14 League in New England?  
 15 A Many times.  
 16 Q And when you spoke for the Anti-Defamation League, did you  
 17 give yourself the title of director of ExitUSA?  
 18 A I don't recall what the date was or what conversations I  
 19 had with them.  
 20 Q Okay. Do you recognize this Facebook post by the  
 21 Anti-Defamation League?  
 22 A It seems vaguely familiar.  
 23 Q And do you see where it says, "Now he directs ExitUSA, an  
 24 organization dedicated to helping others gain the knowledge  
 25 necessary to counter all types of racism and violent

1 extremism"?  
 2 A I read that, I -- but I don't know what date this was  
 3 posted.  
 4 Q I believe this was October of 2017.  
 5 And Mr. Monaco is going to pull up the web page that  
 6 corresponds to it.  
 7 A Well, it appears that the date on the speaking engagement  
 8 was October 19th, which would have been, you know, a year  
 9 after -- actually would have been a month after the separation.  
 10 So, again, this is -- this is a bio that they would have had at  
 11 least a year prior when I booked this engagement provided by my  
 12 speaking agents.  
 13 Q Okay. So between September of 2017 and January of 2018,  
 14 you were operating as Christian Picciolini and no other  
 15 organization; is that correct?  
 16 A I've always operated to some degree on my own. Back from  
 17 2000 when I was doing interventions through the time I was a  
 18 cofounder of Life After Hate, so it's hard to say if I was  
 19 operate -- but I've always operated to some degree as my own  
 20 entity.  
 21 Q And you were operating, of course, your  
 22 ChristianPicciolini.com\ExitUSA page during that period as  
 23 well; is that correct?  
 24 A I don't recall.  
 25 Q You already testified that you forwarded the ExitUSA.org

1 domain to your own domain, didn't you?  
 2 A Yes, I did, but I don't recall if it was during the time  
 3 that you specified.  
 4 Q Okay. Then around January of 2018, you created Free  
 5 Radicals Project; is that correct?  
 6 A That is correct.  
 7 Q And you created a website for Free Radicals Project -- Free  
 8 Radicals dot -- sorry.  
 9 You created a website for Free Radicals Project; is  
 10 that correct?  
 11 A Yes.  
 12 Q And the website was www.FreeRadicals.org; is that correct?  
 13 A Correct.  
 14 Q And then did you forward ExitUSA.org to FreeRadicals.org?  
 15 A I did, believing that it was my property. I did forward it  
 16 for -- until I received the cease and desist, at which point I  
 17 immediately removed it, based on my attorney's guidance.  
 18 Q All right. I'm going to show you a document that's  
 19 Exhibit -- labeled LAH Exhibit 40.  
 20 This is a screenshot --  
 21 MS. SAPER: Go up so you can see the top.  
 22 BY MS. SAPER:  
 23 Q This is a screenshot from Wayback Machine which is a web  
 24 archiving website that allows you to take a snapshot of what  
 25 certain websites were doing at a certain period of time.



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1 Are you familiar with that archiving site?

2 A I'm vaguely familiar.

3 Q And on the snapshot I took, it says that as of March 22nd,

4 2018, ExitUSA.org --

5 MR. GEEKIE: Objection, your Honor.

6 BY MS. SAPER:

7 Q -- was redirecting to FreeRadicals.org.

8 THE COURT: Basis?

9 MR. GEEKIE: No foundation.

10 THE COURT: Okay. It is no foundation. It is

11 hearsay. So you have to ask questions to see what this has to

12 do with anything.

13 So sustained.

14 MS. SAPER: Okay.

15 BY MS. SAPER:

16 Q So without relying on this document, having just shown it

17 to you, necessarily, do you remember what dates and times you

18 were forwarding yourself -- to yourself the "ExitUSA.org"

19 domain name?

20 A It would have been from when I launched the website in

21 January of 2018 until I received the cease and desist letter,

22 at which point I took it down.

23 But if I may comment on this, it says that there's a

24 301 response at crawl time which means that the page was not

25 active on March 22nd. It shows that it was a dead link.

1 Q Did you do that?

2 A I likely did that immediately after my separation because

3 there were dozens of individuals I was working with at the time

4 that nobody else was working with in terms of intervention who

5 were critical cases that needed support.

6 This was -- I don't know what the date was on -- on

7 what I'm looking at now because it's incomplete. But I can

8 tell you that there were people who were contemplating suicide

9 who were communicating with me about potential violence,

10 parents and loved ones who were concerned that their loved ones

11 may be violent, and this was a pretty critical time, and they

12 were having a hard time finding me, being the only person that

13 was doing these interventions. So I took what I believed was

14 my intellectual property, my logo, and the program that I

15 developed, and made it available to them so that they could

16 find me, because there were many people who expressed great

17 concern that they couldn't track me down after -- even after

18 contacting Life After Hate, who refused to pass them along to

19 me.

20 Q This is the same Twitter account that Life After Hate was

21 using during your tenure there; is that correct?

22 A It's hard to say. I don't know what I'm looking at right

23 now.

24 Q Well, we just discussed that you're looking at a screenshot

25 on archive of the Twitter account, and you said you recognize

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1 Q Okay. And let's go to Exhibit 58 and 41. They're kind of

2 in conjunction with each other. We'll start with 58.

3 You testified earlier that you set up the Life After

4 Hate Twitter account; is that correct?

5 I'm sorry, the ExitUSA Twitter account. Is that

6 correct?

7 A I believe so, yes.

8 Q Did you change the URL -- not the URL.

9 Did you change the name of the handle for the ExitUSA

10 Twitter account after you left Life After Hate?

11 A No. It's still ExitUSATeam.

12 Q Okay. Let's go to the -- this is also a snapshot I took,

13 but it's depicting your --

14 MR. GEEKIE: Could I have an exhibit number?

15 MS. SAPER: Fifty-eight.

16 BY MS. SAPER:

17 Q This is a screenshot of the Twitter account, ExitUSA

18 Twitter account.

19 Do you recognize this screenshot?

20 A It looks like the ExitUSA Twitter page, yes.

21 Q Does it state as the name -- you're right that the handle

22 is still ExitUSATeam. But in order to read what the name of it

23 is, I'm looking at the title of the Twitter page. Does it say

24 ExitUSA Now@FreeRadicalsOrg?

25 A It does. It appears to, yes.

1 the Twitter account.

2 A I recognize the header, but I can't speak to what is below

3 that.

4 Q Okay. But there's one Twitter account for ExitUSA that you

5 set up while you were at the organization; is that correct?

6 A There may have been more, but I set up one, yes.

7 Q And this is the same one you then changed the name of after

8 you left the organization, correct?

9 A Again, I can't see the top of the page. I'm looking at a

10 bunch of tweets, so I don't know exactly what you're

11 referencing.

12 Can you ask your question again, please?

13 Q Yeah. This is the same Twitter account that was being used

14 by Life After Hate prior to your disassociation.

15 A It was being used by ExitUSA for the program, not Life

16 After Hate.

17 Q Okay. You still own this account, correct?

18 A I do not.

19 Q Who owns it?

20 A I don't know.

21 Q When did you stop knowing?

22 A When I stopped looking at it, when I received that cease

23 and desist letter.

24 Q So what did you do with the account after you received the

25 cease and desist letter?



1 A I don't know. I haven't looked at it, so I don't know if  
 2 it's been closed. I don't know if it's still open --  
 3 Q Who would have closed it besides you?  
 4 A Twitter, maybe, for not being used. I don't know. I  
 5 haven't looked at it, so I can't answer that question.  
 6 Q Okay. The first tweet on this page refers to Alma Agency.  
 7 Alma Agency is a partner organization with Free  
 8 Radicals Project; is that correct?  
 9 A Alma Agency is a Latino advertising agency based in Miami  
 10 who contacted me about an idea that they had to educate people  
 11 about radicalization online. And they did approach me because  
 12 they had funds to do some pro bono work for somebody. I  
 13 informed them that I wasn't ready to operate yet. But in  
 14 tandem with them, we did launch just an informational website  
 15 Q I'm going to show you what I've marked as Life After Hate  
 16 Exhibit 42.  
 17 (Counsel conferring.)  
 18 MS. SAPER: Okay. Can you go to the page with Bates  
 19 stamp 3761?  
 20 BY MS. SAPER:  
 21 Q This is an email that you sent -- do you recognize this  
 22 document?  
 23 A It looks familiar, yes.  
 24 Q Is it a press release that you drafted and emailed?  
 25 A I don't believe it's a press release, no.

1 Q Is it an email that you drafted and disseminated?  
 2 A I believe so, yes.  
 3 Q And this email is dated May 7th, 2018; is that correct?  
 4 A I don't know. I can't see a date on it.  
 5 Q If you look at the next page.  
 6 MS. SAPER: It's so hard when you're not in front of  
 7 the ...  
 8 BY MS. SAPER:  
 9 Q Is that date accurate?  
 10 A It is. But now that I look at it, this is not something  
 11 that I put out. I believe it was a press release that Alma put  
 12 out.  
 13 Q Okay. But your name is on the first page. It says, "I'm  
 14 so proud of today's launch of our --  
 15 COURT REPORTER: Counsel --  
 16 MS. SAPER: Sorry.  
 17 COURT REPORTER: -- you need to slow down.  
 18 MS. SAPER: Okay. What --  
 19 COURT REPORTER: "But your name is on the first page.  
 20 It says I'm so proud of today's launch of our."  
 21 BY MS. SAPER:  
 22 Q -- "extremism counter-narrative platform at  
 23 WeAreFreeRadicals.net and our new non-profit organization  
 24 website at FreeRadicals.org. Happy to chat further about both.  
 25 Thanks."

1 And then it is your name with your title, "Chief  
 2 Radical, Free Radicals Project."  
 3 Is that accurate?  
 4 A It is, but I don't know that I sent this out to anybody. I  
 5 think it may have been sent out to some formers. I don't know  
 6 that it was sent out widely. In fact, I'm certain of it, it  
 7 wasn't sent out widely. Alma may have sent it out widely as  
 8 part of their press release, but I don't -- I don't know who  
 9 received it.  
 10 Q All right. The bottom of the email states that this is a  
 11 "Copyright 2018 Christian Picciolini." Is that accurate?  
 12 A It is, but I don't know that the copyright is speaking to  
 13 that email or that post or that message. I think it's speaking  
 14 to the copyright of whatever web page --  
 15 Q Okay --  
 16 A -- this is on.  
 17 Q -- but, regardless of the website, is it accurate to state  
 18 that in May of 2018, Free Radicals Project was partnering with  
 19 Alma Agency to develop a search engine platform that would  
 20 bring more traffic to FreeRadicals.net?  
 21 A That is incorrect. It was actually a separate website  
 22 called WeAreFreeRadicals.net that Alma owns. I don't own that.  
 23 Q You stated that Shannon Martinez is your personal  
 24 assistant; is that correct?  
 25 A Correct.

1 Q And she just merely helps you with booking flights and  
 2 helping you with your day-to-day administrative tasks; is that  
 3 correct?  
 4 A When she's not raising her seven children, that's the work  
 5 she does for me, yes.  
 6 Q Does she not have the title of program manager at Free  
 7 Radicals Project?  
 8 A She does, but there are no programs at Free Radicals. It's  
 9 not an operating business.  
 10 Q Does Free Radical -- doesn't Free Radical Project -- Free  
 11 Radicals Project have a website?  
 12 A Yes. Has an informational website.  
 13 Q And the website is accessible currently?  
 14 A To the public? Yes.  
 15 Q Yes.  
 16 Doesn't Free Radicals Project have an active Twitter  
 17 account?  
 18 A It has a Twitter account. I wouldn't say that it's active.  
 19 Q Doesn't Free Radicals Project have a live Facebook account?  
 20 A It does. Again, I don't know that there's much activity on  
 21 it.  
 22 Q You promote Free Radicals Project in the media, don't you?  
 23 A I promote that I am the founder of Free Radicals Project,  
 24 yes.  
 25 Q And you discuss it as an organization that's doing global,

1 multi-disciplinary extremism and violence prevention,  
 2 intervention, and disengagement; is that correct?  
 3 A That is correct. But it is not the organization that's  
 4 doing that; it is me personally doing that.  
 5 Free Radicals does not have any employees. There's no  
 6 salary. We've not fund-raised. We're not a 501(c)(3)  
 7 non-profit organization yet, although we are an Illinois  
 8 non-profit. We have done no business. And there are no  
 9 records or anything to speak of.  
 10 Q But you're an active Illinois non-profit registered with  
 11 the State of Illinois; is that correct?  
 12 A That is correct. But we haven't done any business or --  
 13 until we've been able to fund-raise, I cannot fund that  
 14 organization, so it's just been sitting dormant, waiting.  
 15 Q Both you and Shannon Martinez give interviews to members of  
 16 the media as -- on behalf of Free Radicals Project; isn't that  
 17 correct?  
 18 A I know she does media interviews, and I do. I've certainly  
 19 spoken about the idea of Free Radicals Project. But, again,  
 20 there is no infrastructure. I don't know what Shannon says or  
 21 does in her interviews.  
 22 Q So Shannon is being held out to the public as more than  
 23 just your personal assistant; isn't that correct?  
 24 A Well, technically, she will be an employee of Free Radicals  
 25 Project when the organization can raise the money and operate.

1 But, no, I mean, she operates 100 percent as my personal  
 2 assistant, as my executive assistant. I've also known Shannon  
 3 for 25 years. She was one of the first formers that I actually  
 4 helped disengage.  
 5 Q I'm going to show you an article written by Quartz.  
 6 Is that a picture of Shannon Martinez?  
 7 MR. GEEKIE: Can I have the exhibit number, please?  
 8 MS. SAPER: It's the same exhibit.  
 9 Just scroll down to 3753.  
 10 BY MS. SAPER:  
 11 Q Were you aware that Ms. Martinez was being interviewed by  
 12 Quartz?  
 13 A No.  
 14 Q Okay. And if you look -- if you go down, you see that  
 15 Quartz refers to Ms. Martinez as "a program manager of Free  
 16 Radicals Project, an Illinois-based non-profit that helps"  
 17 disengage -- "people disengage from extremism. Martinez  
 18 cofounded the non-profit with Christian Picciolini."  
 19 Would you say those are accurate statements by Ms --  
 20 MR. GEEKIE: Objection. Hearsay and foundation.  
 21 THE COURT: Okay. Overruled.  
 22 You can ask the question.  
 23 You really -- you could ask the question -- well, I'm  
 24 not going to do a Trial Practice class.  
 25 Just answer that question.

1 Do you need me to reread it?  
 2 THE WITNESS: No. I think I remember it.  
 3 THE COURT: Okay. Is it an accurate -- is it an  
 4 accurate statement?  
 5 BY THE WITNESS:  
 6 A I believe it's accurate. I don't know exactly what I'm  
 7 reading on the page, but I'm assuming you mean the bottom  
 8 paragraph?  
 9 BY MS. SAPER:  
 10 Q Yes.  
 11 A I believe what Shannon says in the first sentence and in  
 12 the second sentence is accurate. She does have the title of --  
 13 the honorary title of program manager and cofounder.  
 14 Again, this is not an organization that's operating.  
 15 But even though somebody is a cofounder of something  
 16 does not necessarily mean they're an employee or that they are  
 17 working for the business.  
 18 Q Okay. You recently gave an interview on January 15th of  
 19 this year with Alan Alda. Does that sound correct?  
 20 A It was one of the highlights of my life. Yes, I remember  
 21 it.  
 22 Q And did you discuss and promote Free Radicals Project, the  
 23 active non-profit, during that podcast?  
 24 A You know, I don't recall what we spoke about. I haven't  
 25 listened to the interview after it was edited, so I don't know

1 what is actually in there. But we spoke about a lot of things.  
 2 And one may have been the idea of, you know, this platform that  
 3 I want to build.  
 4 Q Okay. I'm going to play that podcast so that you can  
 5 remember what you said.  
 6 MS. SAPER: We've marked it as Exhibit -- I don't  
 7 know -- Exhibit 62.  
 8 (Pause in proceedings.)  
 9 (Tape played in open court.)  
 10 MS. SAPER: Sorry, your Honor.  
 11 (Tape played in open court.)  
 12 MS. SAPER: And so on.  
 13 BY MS. SAPER:  
 14 Q So is that you on the podcast?  
 15 A Yes, it is.  
 16 Q Is that you speaking?  
 17 A Yes, it is.  
 18 Q And that's you speaking about Free Radicals Project, the  
 19 active registered non-profit; is that correct?  
 20 A It is a registered company that is not operating. That is  
 21 me promoting what will happen in the future.  
 22 The government shut down for a month, and I was hoping  
 23 at that time that my 501(c)(3) would have come in. It still  
 24 hasn't. It's been over a year.  
 25 Q Okay. I'm also going to direct you to the second page of

1 Exhibit 42.  
 2 This is a screenshot I took of the Free Radicals  
 3 Project Facebook page.  
 4 Do you recognize this as that?  
 5 A I believe that's correct.  
 6 Q And the business information states that it was founded in  
 7 January 15th of 2018. Is that accurate?  
 8 A That is when we incorporated, yes.  
 9 Q And you've listed a whole -- a -- many different methods of  
 10 getting in contact with Free Radicals Project. Is that  
 11 accurate?  
 12 A It appears so, yes.  
 13 Q And you state that the organization is, in present tense,  
 14 "a global, multi-disciplinary extremism and violence  
 15 prevention, intervention, and disengagement platform and  
 16 practice."  
 17 That's stated in the present tense, not that it is  
 18 going to be. Is that correct?  
 19 A Well, it was a -- it was a company that was incorporated.  
 20 But I can tell you that I alone was the one doing that, not  
 21 under the Free Radicals Project, but under Christian  
 22 Picciolini. So I did see the work that I was doing as being  
 23 similar to what the Free Radicals Project would do.  
 24 Q But, again --  
 25 A The truth is that it is not an operating company. There is

1 not one employee, including myself. There are no financial  
 2 transactions. There are no fundraising opportunities. It is a  
 3 business laying in wait for that 501(c)(3) so that I can  
 4 fund-raise to actually operationalize it.  
 5 MS. SAPER: Before I move on, I'd like to move  
 6 Exhibit 42 and the sound recording into evidence, your Honor.  
 7 THE COURT: Okay. Any objection?  
 8 They will be admitted.  
 9 MR. GEEKIE: Well, your Honor, I do have an objection.  
 10 THE COURT: To which one?  
 11 MR. GEEKIE: Well, I don't object on 42 to the first  
 12 two pages, but there's a whole -- well, the first three,  
 13 because I think she asked about that.  
 14 THE COURT: You're going to have to talk towards me  
 15 because I won't be able to hear you if you're --  
 16 MR. GEEKIE: I'm sorry.  
 17 THE COURT: -- talking into the table.  
 18 MR. GEEKIE: The first -- the first three pages,  
 19 Judge, I don't have an objection to because she asked questions  
 20 about them. But it's a conglomeration of various documents.  
 21 Like, for example, the fourth document, she asked  
 22 Mr. Picciolini about the Alma press release, and he said that  
 23 wasn't his and he didn't have familiarity with it. So we don't  
 24 object to the first three pages. But the rest we do because  
 25 there was no foundation laid for the rest of the exhibit.

1 THE COURT: So is it all one document?  
 2 MS. SAPER: Exhibit 42 is comprised of the screenshot  
 3 of the Free Radicals Project Facebook page promoting the sound  
 4 recording that we listened to. And that sound recording is  
 5 Exhibit 62. And I asked Mr. Picciolini if he recognized this  
 6 post and if he spoke on this program, and he stated yes.  
 7 THE COURT: Right. I don't think that's -- we're not  
 8 at the recording.  
 9 So the question is whether all of those exhibits that  
 10 are a subset of 42 are the same document, and it's a rule of  
 11 completeness question, or if it is some type of separation that  
 12 I don't know of.  
 13 MS. SAPER: They're different documents. One is of a  
 14 screenshot relating to the recording.  
 15 The second is the Facebook page that Mr. Picciolini  
 16 identified.  
 17 The third is the press release that is copyrighted by  
 18 Mr. Picciolini and he says he helped author regarding Alma.  
 19 And it's written by him. It says, "Thanks, Christian  
 20 Picciolini."  
 21 And then the only one that may be in question is the  
 22 Quartz article, which is about Ms. Martinez, which I didn't ask  
 23 about to admit into evidence, but to corroborate that  
 24 Ms. Martinez is not just a personal assistant, she's holding  
 25 herself out to the public as a cofounder of the Free Radicals

1 non-profit.  
 2 THE COURT: Okay. And it's that last one that I think  
 3 you have an objection to because he's saying that the first  
 4 four are appropriately laid, the foundation is laid.  
 5 So that will be sustained for the last one, which is  
 6 just used to impeach.  
 7 MR. GEEKIE: Well, and to be clear, your Honor,  
 8 there's -- the fourth page seems to be this Alma document that  
 9 they also spoke of and --  
 10 THE COURT: I don't know because, I mean, what am I  
 11 looking at? I don't -- I have a binder of defendants'  
 12 exhibits.  
 13 MS. SAPER: Do you have a copy here?  
 14 THE COURT: But -- do I have these exhibits? Did  
 15 someone give me the binder of exhibits?  
 16 MS. SAPER: I'm not sure, your Honor. We may not  
 17 have.  
 18 We have them back here. We'll organize them.  
 19 But I can hand them to you, if that helps.  
 20 THE COURT: It would help.  
 21 MR. GEEKIE: So, your Honor, for the record,  
 22 Mr. Picciolini identified the first three pages of Exhibit 42.  
 23 We do not object to those three pages being admitted. The rest  
 24 of the document he did not identify. There wasn't a foundation  
 25 laid that he had -- was involved in the creation of these or

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1 that he's even seen these documents.

2 THE COURT: Okay. So I disagree as far as -- so the

3 third page, which is marked LAH3761, is the beginning of the

4 press release, for lack of a better term, to 3764. And that

5 shall be admitted, as well as the ones prior to that.

6 (Said exhibit received in evidence.)

7 THE COURT: And the Quartz article, which was used to

8 impeach, is just used for impeachment and shall not be

9 admitted.

10 That's my ruling. Okay?

11 MR. GEEKIE: Thank you, Judge.

12 THE COURT: Okay.

13 (Counsel conferring.)

14 BY MS. SAPER:

15 Q The next exhibit we're going to use is Life After Hate

16 Exhibit 39.

17 Christian, do you recognize this? Do you recognize

18 this document?

19 A I do.

20 Q Is it a screenshot of the Free Radicals website?

21 A It appears to be a screenshot of the home page, yes.

22 Q And does the tagline "No Judgment. Just Help," is that

23 listed prominently on the left-hand side?

24 A Yes, it is. That's copy that I developed and copyrighted.

25 Q That's a tagline that you helped develop while you were at

1 various ways that Alma had done some advertising to direct

2 people to that page, but I wasn't involved in that.

3 Q And who operates WeAreFreeRadicals.net?

4 A Alma.

5 Q And when -- when leads come in through that website, where

6 do they go?

7 A There are no leads that come in through that website. It's

8 an informational website.

9 Q And who populates the informational website?

10 A Alma wrote the copy.

11 Q And did you participate in writing that copy?

12 A I did not.

13 Q And what is -- what is Free Radicals' association with Alma

14 then, if it has nothing to do with the website and doesn't own

15 it?

16 A Well, like I mentioned earlier and testified to, they had

17 received a grant to do some pro bono work. And they liked the

18 disengagement work that I was doing but they couldn't support

19 an individual. So they decided to create this website that

20 would educate people about how they were being radicalized

21 online and wanted to attach it to an organization. And since

22 Free Radicals was an Illinois corporation, even though we

23 weren't doing business, it was totally fine with me to educate

24 people on how, you know, their web search terms might be

25 radicalizing them.

273

Picciolini - Direct (Resumed) by Saper

1 Life After Hate in which you created collateral for -- through

2 Gravity Tank; is that correct?

3 A That's not accurate, no.

4 I was always a volunteer of Life After Hate. I was

5 never an employee. I created a lot of intellectual property

6 and assets, including their logo, the ExitUSA logo, the videos,

7 and also this tagline.

8 I didn't do that with the help of Gravity Tank.

9 Gravity Tank formalized and finalized the artwork that I

10 provided them to make it high resolution.

11 Q And then on the video here, it says, "Free Radicals, There

12 is Life After Hate." Is that correct? Is that yours, your

13 language that you put up here?

14 A I believe that's what it says on there, yes.

15 Q And then it says, "Click here to learn how the internet is

16 used to radicalize us." Where does that go?

17 A That goes to a website that Alma created called

18 WeAreFreeRadicals.net that they own.

19 Q And what is WeAreFreeRadicals.net?

20 A It's an informational website that allows people to see how

21 their web searches may lead to extremism.

22 Q So if I -- if I searched something like -- something that's

23 hateful as a key word, I could come to FreeRadicals.net. Is

24 that how it works?

25 A No. It would be WeAreFreeRadicals.net. And there were

275

Picciolini - Direct (Resumed) by Saper

1 Q Okay. So to be clear, Alma did this with the non-profit

2 Free Radicals because they couldn't support an individual.

3 That's what you just testified to.

4 A There was no -- there was no formal agreement. They

5 definitely used the Free Radicals name. But certainly there

6 was no kind of formal partnership or formal agreement with

7 them.

8 Q Okay. I'm going to the second page -- or I guess -- the

9 one --

10 (Counsel conferring.)

11 BY MS. SAPER:

12 Q Okay, the one marked 3779.

13 Is this also a screenshot from your website?

14 A I believe this is the "About" page on our Free Radicals

15 website, yes.

16 Q And you're in a picture. Is that you in the picture?

17 A Yes. With --

18 Q And the words "Life After Hate" written in graffiti in that

19 photo?

20 A It appears that "Stop Hate, Life After Hate" is written in

21 chalk at the memorial site for where two men were killed in

22 Portland, yes.

23 Q And, again -- so you've listed yourself and Shannon

24 Martinez as the program director in the "About Us" page; is

25 that correct?

1 A I believe we've established that before, yes.  
 2 Q And at the top, there's a "Donate" button. Is that button  
 3 still active right now?  
 4 A It is. But if you click on that "Donate" button, it  
 5 advises people to not donate because we aren't an operating  
 6 business.  
 7 Q But it says that if you would like to donate, you could do  
 8 it to the -- just anyway and not to the non-profit.  
 9 A Correct. But we haven't accepted any donations. We've  
 10 actually turned some away.  
 11 MS. SAPER: I'd like to move Exhibit 39 into evidence,  
 12 your Honor.  
 13 THE COURT: Okay. That will be admitted.  
 14 (Said exhibit received in evidence.)  
 15 BY MS. SAPER:  
 16 Q You testified that you created the YouTube account for  
 17 ExitUSA; is that correct?  
 18 A I believe I did.  
 19 Q And that account is no longer active. Are you aware of  
 20 that?  
 21 A I'm not aware of it, but I would suspect that it went  
 22 inactive after I lost access to my Life After Hate email  
 23 because it probably was tied to that.  
 24 Q I asked if -- during your deposition, I asked if you had  
 25 deleted the account, and you stated you don't recall. Is that

1 MS. SAPER: We can use the one -- we already did.  
 2 BY MS. SAPER:  
 3 Q Okay. The Twitter account is no longer active. In fact,  
 4 it's been deleted. Did you delete it?  
 5 A I don't recall.  
 6 Q You don't recall if you deleted it?  
 7 A I don't recall. I don't know.  
 8 Q Did you transfer the domain name -- I'm sorry, the Twitter  
 9 Life -- did you transfer the ExitUSA Twitter account to  
 10 anybody?  
 11 A I don't recall.  
 12 Q Okay. I'm going to now -- bear with me.  
 13 I'm going to point you to Life After Hate Exhibit 54,  
 14 which is the Plaintiff's Motion to Compel Defendants' Discovery  
 15 Responses.  
 16 MR. GEEKIE: Objection, your Honor. Foundation. This  
 17 is a motion. It's not evidence. And it's improper to ask a --  
 18 THE COURT: Okay. So I think what is appropriate is  
 19 for you to ask regarding his familiarity with the motion,  
 20 because, of course, you have to review the motion with your  
 21 clients, et cetera, et cetera, so don't just jump to the  
 22 document.  
 23 Remember, documents either reinforce a statement or  
 24 they dispute a statement. So don't jump to the documents  
 25 first. Use the testimony, and then use the documents in the

1 still accurate?  
 2 A I don't recall.  
 3 Q Did you transfer access -- did you have access to the  
 4 ExitUSA YouTube account after you left Life After Hate?  
 5 A I don't remember.  
 6 Q You did have access to the ExitUSA Twitter account after  
 7 you left; is that correct?  
 8 A Yes, I believe so, for a short time.  
 9 Q And that's at least enough time for you to be able to  
 10 change the name of the account from ExitUSA  
 11 Now@FreeRadicals.org; is that correct?  
 12 A Again, the name of the account was not changed. The handle  
 13 was always ExitUSATeam.  
 14 (Counsel conferring.)  
 15 MS. SAPER: Okay. It was Exhibit 41. Did we submit  
 16 that into evidence?  
 17 Your Honor, did we move Exhibit 41 into evidence?  
 18 THE COURT: I think so. But if not, you can do it.  
 19 Is it this one that's on the screen?  
 20 MS. SAPER: No. It's the one with the YouTube --  
 21 THE COURT: I don't know.  
 22 MS. SAPER: I mean the Twitter page.  
 23 THE COURT: I don't know.  
 24 MS. SAPER: The archive one, right?  
 25 (Counsel conferring.)

1 way to either corroborate or negate. That's the way you use  
 2 documents.  
 3 MS. SAPER: Yes.  
 4 BY MS. SAPER:  
 5 Q Christian, do you remember responding to Requests for  
 6 Admit?  
 7 A I remember responding to all sorts of interrogatories for  
 8 this case, yes.  
 9 Q And do you remember responding to Requests for Admit?  
 10 A I would have responded to everything, so yes.  
 11 Q And do you remember responding to the Requests for Admit  
 12 for Free Radicals Project?  
 13 A Yes.  
 14 Q Okay. So I'm going to show you --  
 15 THE COURT: Ask the question. Don't show anything.  
 16 Just ask the question. Either it's going to be corroborated or  
 17 disputed by your document.  
 18 MS. SAPER: Okay.  
 19 BY MS. SAPER:  
 20 Q Okay. Christian, between August of 2011 and November of  
 21 2012, were you the director of Life After Hate?  
 22 A I held a lot of titles at Life After Hate. I don't recall  
 23 specifically during that time what my title may have been. It  
 24 may have been more than one.  
 25 I believe I was from August 11th -- or August 2011, I

1 was the executive director during that time, and I believe I  
 2 was also executive -- sorry, executive board chair during that  
 3 time and then also executive director.  
 4 Q Between November of 2012 and 2015, were you the executive  
 5 board chair of Life After Hate?  
 6 A I'm going to have to give you the same answer. I don't  
 7 recall which dates I was what. But I always held at least a  
 8 board chair and at some points an executive director.  
 9 Q From spring 2015 to April of 2017, were you the board --  
 10 you were the board chair of Life After Hate, weren't you?  
 11 A I believe that's correct, yes.  
 12 Q From April of 2017 until August of 2017, you were the  
 13 program director of Life After Hate's ExitUSA program.  
 14 A I believe that was one of my titles at the time, yes.  
 15 Q And --  
 16 A I was also a board member, I believe, during part of that  
 17 time.  
 18 Q And you paid for the "ExitUSA.org" domain name with a \$500  
 19 cashier check that was drawn from the Life After Hate bank  
 20 account; is that correct?  
 21 A I believe I testified yesterday that I did buy the domain  
 22 name. I don't recall what the circumstances were around how it  
 23 was paid, if the cashier's check came from my personal account  
 24 or if it came from Life After Hate or if I was -- I, frankly,  
 25 don't remember the exact circumstances around that. But I did

1 purchase it believing that it was mine. I was purchasing it  
 2 with my money, my personal money, not the organization's money.  
 3 Q Prior to your resigning from Life After Hate, you demanded  
 4 multiple times that Life After Hate, the Illinois non-profit,  
 5 allow you to leave the organization or to spin off the  
 6 organization with the ExitUSA program; is that right?  
 7 A I don't believe I resigned from Life After Hate. I don't  
 8 believe I demanded anything. But there were many discussions  
 9 about my interest in spinning off ExitUSA to establish a  
 10 separate entity because I thought it would be good for  
 11 fundraising to have two entities doing that.  
 12 Q Life After Hate suspended you as program director of  
 13 ExitUSA in 2017; is that right?  
 14 A I believe they wrongfully did that, yes.  
 15 Q By the end of August of 2017 -- I'm sorry, strike that.  
 16 You're not licensed with a government body or a state  
 17 or you don't possess a college degree to provide licensing  
 18 services; is that correct?  
 19 MR. GEEKIE: Objection. Form.  
 20 THE COURT: Overruled.  
 21 BY THE WITNESS:  
 22 A I have a degree in international business and international  
 23 relations. I graduated with a 3.98 GPA from DePaul. I've been  
 24 doing intervention and support work and mentoring work for  
 25 formers since 2000. But, no, I do not have a formal

1 psychological degree or anything like that.  
 2 BY MS. SAPER:  
 3 Q Okay. While you were at Life After Hate, Inc., you  
 4 transferred the "ExitUSA.org" domain name from Life After Hate,  
 5 Inc.'s GoDaddy account to your own personal account on Google  
 6 domains; is that right?  
 7 A That's correct. The website was hacked, and the only way  
 8 to try and clear the malware was to switch domain providers  
 9 MS. SAPER: No further questions.  
 10 THE COURT: Okay.  
 11 (Counsel conferring.)  
 12 THE COURT: What are you going to be using for  
 13 exhibits?  
 14 MR. GEEKIE: Pardon me, Judge?  
 15 THE COURT: What device are you going to be using for  
 16 exhibits?  
 17 MR. SCHULTIS: VGA.  
 18 THE COURT: Did that work for you?  
 19 MR. SCHULTIS: Yes.  
 20 THE COURT: Yes. All right. You may proceed.  
 21 MR. GEEKIE: Thank you, Judge.  
 22 CROSS-EXAMINATION  
 23 BY MR. GEEKIE:  
 24 Q Mr. Piccolini, what would you consider your current  
 25 profession?

1 A I'm a published author. I'm a public speaker. I am a  
 2 mentor and counseling provider for people disengaging from all  
 3 sorts of violent extremism, from white nationalists to ISIS. I  
 4 work all over the world. And that's -- there's real -- no job  
 5 description -- pertinent job name for that, but I do many  
 6 things.  
 7 Q Okay. And your background was touched upon in your  
 8 examination by Ms. Saper.  
 9 Would you briefly tell the Court your background as it  
 10 relates to assisting people who want leave extremist groups?  
 11 A Sure. I'll start from the beginning because I think it's  
 12 relevant.  
 13 I was born in '73 to Italian immigrant parents who  
 14 worked very hard. And for the first 14 years of my life, I  
 15 felt very abandoned by them. And at 14 years old, that led to  
 16 me being recruited in 1987 to America's first skinhead group  
 17 here in Chicago. And for eight years, from the time I was 14  
 18 until I was 22, I remained a member of that until I found a way  
 19 to break away from it. I spent a few years after that  
 20 contemplating what I had done. I wasn't sure how to proceed.  
 21 There wasn't an organization at that time to help people  
 22 disengage.  
 23 And then in 2000, I started doing this work  
 24 unofficially. It kind of just happened. I would meet people,  
 25 old people that I knew from my crew that knew I had left, and



1 they would reach out to me for advice on how to do that. So I  
2 started to formalize it more.

3 I had known Arno since 1988. He was --

4 Q Michaelis?

5 A Arno Michaelis since 1988. He was the first skinhead  
6 outside of Chicago that I had met. We became very close  
7 friends. I ended up managing his band in later years.

8 And from the first moment I met him, he was passed out  
9 drunk. And for the rest of the time I knew him, I was the one  
10 who helped pick him up each one of those times.

11 In '96 when I left the movement, I disconnected from  
12 Arno because he was still involved. And we went our separate  
13 ways until roughly 2004 when, through the magic of Facebook, we  
14 reconnected.

15 We started throwing around the idea of what would end  
16 up being Life After Hate in 2009.

17 Q Before we go into Life After Hate, though, let's touch on  
18 what you've done with regard --

19 A Sure.

20 Q -- to disengagement.

21 A Sure.

22 Q I think you said it was around 2000 that you started the  
23 thing you do today, that is, assist people in disengaging from  
24 extremist groups; is that right?

25 A Correct.

1 psychologists and, in fact, the government and FBI and other  
2 organizations have touted as well.

3 Q Now, did you develop these skills on your own, or did you  
4 work with other people to help develop them?

5 A I developed them mostly on my own in the earliest years.  
6 Later on, I worked with psychologists and other professionals  
7 in the industry who were not formers to -- to really cement and  
8 polish that process.

9 Q And what kind of services do you provide?

10 A I'm a mentor. I'm an adviser. I train law enforcement on  
11 what is radicalizing young people today, on the state of the  
12 movement.

13 And then for people who are disengaging, it's very  
14 important to listen to them. I'm a good listener. And I  
15 identify what Alan Alda calls potholes, because I called them,  
16 and those are traumas that exist.

17 So I try and help repair those traumas by finding  
18 service providers like psychologists, job coaches, life  
19 coaches, educators, tattoo removal specialists, to help these  
20 people fill those potholes and find a way to reintegrate with  
21 society.

22 Q I think in your conversation with Mr. Alda you described  
23 yourself as kind of like the Triple A, the automobile club?

24 A That's right. I'm kind of like an emergency tow truck that  
25 people call when they're stuck in a pothole, and then I

1 Q How did that happen?

2 A In 2000 I was walking through Water Tower Place with a  
3 short-sleeve shirt, and I still had some visible tattoos from  
4 my time in the movement. And a man approached me in the  
5 hallway of the mall and said, "Hey, bro, nice tattoo, White  
6 Power." And at the time, I was out. And I said, "Hey, bro,  
7 let's talk." And that was -- that five- or ten-minute  
8 conversation was the first time that I counseled somebody on  
9 leaving.

10 I didn't stay in contact with that person. It wasn't  
11 something that I thought would end up being something that I  
12 did for the rest of my life.

13 But in 2004 when my brother was murdered, I knew that  
14 the -- that I wanted to be that person to help people disengage  
15 from different types of violence.

16 Since then, I've helped over 300 people disengage from  
17 various extremist groups.

18 Q And how did you develop your skills in this area?

19 A Well, I think an important part of my skill-set that  
20 actually has a void in the industry is that I am a former  
21 extremist. I interfaced with thousands of people at that time  
22 and heard thousands of stories of how people were led in, but  
23 also witnessed what kept people in. And having disengaged  
24 myself, I put that knowledge to use, and I've developed a  
25 proprietary process to help people disengage that many

1 assemble a team of people to help them through that.

2 Part of what I do is also immersing people with those  
3 that they think that they hate. So many times I'm introducing  
4 them to people that would be, you know, objects of their hate  
5 to try and destroy the demonization and replace it with  
6 humanization.

7 Q Do you engage in any kind of activities or counseling that  
8 would require you to have any kind of a license or medical  
9 degree?

10 A No, not at all. In fact, gang members have been doing this  
11 type of exit work for many, many decades similar to what I do,  
12 so no.

13 Q And how do clients find you?

14 A I do many interviews. I'm on national press and media.  
15 I've written a pretty critically acclaimed book. I have a  
16 television documentary series on MSNBC that highlights my  
17 intervention work. And they contact me directly after  
18 searching for me. I'm pretty easy to find.

19 MR. GEEKIE: Could you pull up Exhibit 2Q please?

20 MR. SCHULTIS: It's on this one, but not that one.

21 MR. GEEKIE: That's all right. I'll go off the hard  
22 copy.

23 THE COURT: Are you not able to see it on the screen  
24 as well?

25 MR. GEEKIE: No, your Honor. It's not here.



1 THE COURT: Better check on that.  
 2 THE WITNESS: I see it.  
 3 THE COURT: It's on everybody else's, yes. And if you  
 4 want to know what he's looking at, it's on the jury box.  
 5 MR. GEEKIE: Okay.  
 6 BY MR. GEEKIE:  
 7 Q Mr. Piccolini, I believe you have Exhibit 23 -- I'm sorry,  
 8 Defendants' Exhibit 20 in front of you.  
 9 Can you identify this?  
 10 A This appears to be a screenshot of my LinkedIn page.  
 11 Q And the first entry at the top or right under your name, it  
 12 talks about MSNBC "*Breaking Hate*." Is that your TV show?  
 13 A Yes, that's my documentary series.  
 14 Q And can you tell us briefly what that's about?  
 15 A The show deals with following me around during my work  
 16 intervening and helping people disengage from hate groups. And  
 17 part of -- it highlights the process of what I do, how I  
 18 listen, how I leverage other resources, and also how I  
 19 immerse people with -- with folks that they would not normally  
 20 have engaged in.  
 21 Q And on the second page, is that -- of the document,  
 22 *Breaking Hate*, does that accurately describe the TV show?  
 23 A Yes.  
 24 Q And then if you go back, further back to the page marked  
 25 LAH3810, do you see where it says "founder ExitUSA"?

1 A Yes.  
 2 Q And I see there that you show that you are separated from  
 3 ExitUSA; is that right?  
 4 A That's correct. I believe I updated that on September 1st,  
 5 2017.  
 6 Q Okay. And then the next page where it says "Life After  
 7 Hate," it lists you as a cofounder.  
 8 Does that also show that you've disengaged or  
 9 disassociated with Life After Hate?  
 10 A Yes, I would have updated that the same day.  
 11 MR. GEEKIE: Your Honor, I'd move for the admission of  
 12 Defendants' Exhibit 20.  
 13 THE COURT: Okay. Any objection?  
 14 MS. SAPER: No, your Honor.  
 15 THE COURT: It will be admitted.  
 16 (Said exhibit received in evidence.)  
 17 BY MR. GEEKIE:  
 18 Q Now, in your work today, have you assisted government  
 19 agencies with respect to anti-extremism?  
 20 A Yes, many. I've worked with the FBI, the Department of  
 21 Justice, the State Department, National Institute of Justice.  
 22 Q Department of Homeland Security?  
 23 A Department of Homeland Security I've done extensive work  
 24 with. Just about every government agency that deals with  
 25 counter-extremism. I've also spoken at The White House to the

1 National Security Council and presented information to them  
 2 about the work that I do.  
 3 Q Okay. Now I'd like to talk to you about when you  
 4 reconnected with Mr. Michaelis and Life After Hate came about.  
 5 Did you play a role in the original development of the  
 6 term "Life After Hate"?  
 7 A Yes, I did.  
 8 Q Would you briefly tell us how that occurred?  
 9 A There were -- prior to 2010, in 2009, and even before that,  
 10 from 2004 to 2009, many discussions were had between me and  
 11 Mr. Michaelis about the idea of an organization helping people  
 12 educate them about racism, but also to help them disengage. I  
 13 had always been very interested in the disengagement part,  
 14 while Mr. Michaelis was always interested in the publishing  
 15 part of that. In fact, he had a division called la Prensa.  
 16 But during that time prior to 2009, many names were  
 17 tossed around, none of which stuck. But "Life After Hate"  
 18 seemed to have a good ring to it.  
 19 Q And can you put a number on a percentage that you or  
 20 Mr. Michaelis might have played in creating that term "Life  
 21 After Hate"?  
 22 A I would say Arno was probably a little bit heavier on that  
 23 side. I believe he was already talking about naming his book  
 24 "My Life After Hate" that he hadn't published yet.  
 25 I don't recall exactly what the weight was, but I

1 certainly had something to do with it, although I can't really  
 2 speak to the weight.  
 3 Q And after you played a role in creating the name, did you  
 4 use "Life After Hate" in commerce? For example, to conduct  
 5 business or buy or sell materials or do marketing or  
 6 advertising?  
 7 A Actually, "Life After Hate" was used in commerce even prior  
 8 to the website launch in 2010, as far back as 2009, where we  
 9 had put ourselves out as Life After Hate. Yes.  
 10 Q And did you -- Life After Hate, Mr. Rangel described as  
 11 just an online journal.  
 12 Were you conducting commerce as an online journal in  
 13 2009 and 2010?  
 14 A Yes, we were conducting commerce both with the online  
 15 journal and through intervention work, yes.  
 16 Q And were you using the term "Life After Hate" before you  
 17 incorporated in Wisconsin as Life After Hate, Inc.?  
 18 A Yes. We incorporated in February 20 -- February 2010, I  
 19 believe. And we had been using the name together as far back  
 20 as 2009.  
 21 In fact, the website actually went up to do commerce  
 22 in January -- on Martin Luther King's birthday in January  
 23 2010 -- I'm sorry, January 2010 before the organization was  
 24 incorporated.  
 25 (Counsel conferring.)

1 MR. GEEKIE: Can you pull up Life After Hate  
 2 Exhibit 13?  
 3 BY MR. GEEKIE:  
 4 Q I'm going to show you an exhibit --  
 5 MR. GEEKIE: Tell me when it's up too, so I know.  
 6 BY MR. GEEKIE:  
 7 Q I'm going to show you an Exhibit marked as, and previously  
 8 shown to you, as Life After Hate 13.  
 9 MR. GEEKIE: Your Honor, in case this wasn't admitted,  
 10 I'll move for the admission of it now. It's a Life After Hate  
 11 exhibit.  
 12 THE COURT: Any objection?  
 13 MS. SAPER: No, your Honor.  
 14 THE COURT: Okay. It will be admitted.  
 15 (Said exhibit received in evidence.)  
 16 BY MR. GEEKIE:  
 17 Q Mr. Piccolini, in this document do you see the dates of  
 18 the emails that are exchanged here?  
 19 A Yes. It appears November 30th, 2009 and even  
 20 November 29th. Possibly earlier.  
 21 Q And these emails have to do with the operation of Life  
 22 After Hate?  
 23 A Yes, that's correct. This would have been an email from me  
 24 to Arno copying some other volunteers and for Life After Hate  
 25 at the time directing them and giving feedback on the original

1 website.  
 2 Q And if you go to the bottom, I see that Arno Michaelis has  
 3 a Life After Hate email address, too?  
 4 A Yes, that's correct.  
 5 Q Now, after the name Life After Hate was created -- well,  
 6 after this -- I'm sorry, strike that.  
 7 Was it after this email that's marked as Life After  
 8 Hate 13, Exhibit 13, that the company Life After Hate was  
 9 incorporated in Wisconsin?  
 10 A Yes.  
 11 Q And at the time that Life After Hate was incorporated in  
 12 Wisconsin, were you providing exit and intervention services  
 13 using the name Life After Hate?  
 14 A Yes.  
 15 Q And did you continue to do that after Life After Hate was  
 16 incorporated in Wisconsin?  
 17 A Yes.  
 18 Q Was Life After Hate, in your view, just an online journal?  
 19 A No, sir.  
 20 Q What would you describe it as?  
 21 A Life After Hate was, in part, an online journal in order to  
 22 tell mine and Mr. Michaelis' stories so that other people  
 23 around the world could see that change was possible and then  
 24 come to us for disengagement services. So it was much more  
 25 than that. It was an online journal. It was an intervention

1 network. It was a mentorship. And it was a support group.  
 2 Q And who were two of the people that were the authors of the  
 3 first edition of the online journal?  
 4 A That would have been almost solely me and Mr. Michaelis.  
 5 Q And in providing the services related to Life After Hate  
 6 while it was a Wisconsin corporation, who was it that was  
 7 providing those exit and intervention services?  
 8 A Exclusively me.  
 9 Q And do you believe that you own a share of the trademark in  
 10 the term "Life After Hate"?  
 11 A Yes, I do.  
 12 Q Why is that?  
 13 A I codeveloped it, along with all of the assets, the  
 14 intellectual property that the organization is currently using,  
 15 which I changed after Mr. Michaelis had left the organization.  
 16 Q And at the time that Life After Hate was incorporated in  
 17 Wisconsin, were you playing a leadership role in the  
 18 organization?  
 19 A Yes, I was.  
 20 Q And what would you -- or how would you describe that role?  
 21 A I would say that Arno and I were the cofounders. And while  
 22 he was executive director, I managed a lot of the partnerships  
 23 while I was a board -- executive board chair for the  
 24 organization. I did a lot of work for the organization in  
 25 terms of setting up the partnerships with government, with

1 doing the intervention work, as well as creating some of the  
 2 materials for the website and for others. But there was also a  
 3 printed journal that was distributed as well in early 2010.  
 4 Q And just so we're clear -- and I think there was some  
 5 testimony about this Friday -- but Life After Hate established  
 6 an online website while it was a Wisconsin corporation?  
 7 A Yes. Actually before then.  
 8 Q Okay. Before it incorporated, it had a website.  
 9 A Correct.  
 10 Q And with respect to the Wisconsin corporation, were there  
 11 expenses associated with running the Wisconsin Life After Hate?  
 12 A Yes, there were website expenses. There was a technical  
 13 consultant that I paid for, and I know Mr. Michaelis also put  
 14 in some money. There were bookkeeping fees that needed to be  
 15 paid. There were business cards. All sorts of marketing  
 16 materials. And certainly also the printed online journal. But  
 17 I had also paid for my own travel and hotel room and lodging  
 18 when I did these interventions when I would travel to meet  
 19 people face-to-face.  
 20 Q So was it only you or you and Mr. Michaelis and others that  
 21 were making these payments related to the operation of the  
 22 Wisconsin Life After Hate?  
 23 A It was just me and Mr. Michaelis.  
 24 Q And do you recall if you were accepting donations with the  
 25 Wisconsin Life After Hate?

1 A I don't recall. I believe there may have been some early  
2 donations that came in even before the 501(c)(3). I don't  
3 recall exactly if they were donations or grants or just in  
4 kind --  
5 Q Okay.  
6 A -- things. But yes.  
7 Q So then it was your testimony Friday, in 2011 there was a  
8 SAVE conference. That was a conference in Ireland. Do you  
9 remember that?  
10 A Yes, June 2011.  
11 Q And -- and how did you come to attend that conference?  
12 A I was invited as a member of the formers' community,  
13 somebody who had been a former extremist to interface with  
14 survivors of extremism. And there were many other people  
15 there, including former gang members, former IRA, former other  
16 sorts of extremists, and then government people as well. So  
17 they recognized my part in that industry and wanted me to speak  
18 on a panel.  
19 Q And is it at that conference where you met Mr. McAleer,  
20 Mr. Rangel, Ms. King, and Mr. Meeink?  
21 A Yes, it was the first time that I met I believe at least  
22 Ms. King, Mr. Meeink, Mr. McAleer. I may have met Mr. Rangel  
23 before then, but I'm not sure.  
24 Q And Mr. Michaelis, was he at the conference?  
25 A Yes, he was.

1 Q Did he know any of the four people I mentioned McAleer,  
2 Rangel, King, and Meeink?  
3 A I believe he knew Mr. Rangel personally. I'm not sure that  
4 he ever met any of the others in person or had any prior  
5 knowledge of them.  
6 Q And can you describe how it came about that these four  
7 people -- Meeink, McAleer, Rangel, and King -- came to then  
8 join Life After Hate?  
9 A Me and Arno asked them. I was always very passionate about  
10 having the organization be made up of formers, and Arno was as  
11 well, Mr. Michaelis. So when we met other people who seemed,  
12 you know, bright, who seemed like they wanted to make a  
13 difference, we asked them to be a part of the organization, and  
14 at that moment is when Arno and I decided to form a non-profit.  
15 Q And so you invited these four individuals to join Life  
16 After Hate?  
17 A Yes. It was at that conference where both me and Arno  
18 asked Mr. McAleer and Ms. King, Mr. Rangel, and Mr. Meeink, and  
19 also Mr. T.J. Leyden, who ended up not joining, to be a part of  
20 this organization and go forward with a non-profit.  
21 Q Now, Mr. McAleer, Mr. Rangel, and Ms. King in their  
22 pleadings have claimed to be cofounders of Life After Hate. Is  
23 that accurate?  
24 A That is not accurate, no.  
25 Q Why do you say that?

1 A Because Life After Hate was founded in 2009. The mission  
2 of Life After Hate never changed since 2009. The only thing  
3 that happened was that the organization moved to Chicago in  
4 2012 because I was based in Chicago. And I decided to, with  
5 Mr. Michaelis, form a non-profit in Illinois that I would run.  
6 Q And at that time that you decided on moving the corporation  
7 to Chicago and making it a non-profit, who was the director of  
8 Life After Hate?  
9 A I believe Mr. Michaelis was director, and I was executive  
10 chair.  
11 MR. GEEKIE: Would you -- could you turn to  
12 Exhibit 11? Defendants' 11, please.  
13 BY MR. GEEKIE:  
14 Q And if you would look at Exhibit 11, can you identify this  
15 document?  
16 A This is an email that I sent out immediately after the SAVE  
17 conference in Dublin, Ireland, in 2011 where I was directing  
18 people about my plans to go forward with the 501(c)(3).  
19 And if you can see here, everybody was just a  
20 volunteer at the time -- well, including myself -- but only  
21 Arno and I had Life After Hate emails at the time.  
22 Q With respect to the Life After Hate emails, is there any  
23 significance to the fact that these individuals -- Mr. Meeink,  
24 Mr. McAleer, Mr. Rangel, and Ms. King -- actually, I don't see  
25 Ms. King in these -- but that Rangel, Mr. Rangel, Mr. Meeink,

1 Mr. McAleer don't have Life After Hate email addresses?  
2 A Well, they weren't officially a part of Life After Hate  
3 yet. They weren't actually volunteers yet. This was still the  
4 early discussion of that. But also Arno and I had some  
5 questions about some of the people, and we weren't quite sure  
6 at that time about necessarily bringing them on.  
7 Q And did you send this email out, the initial -- the email  
8 at the very top that discusses starting the 501(c)(3), did you  
9 send this to seek permission of Mr. Rangel, Mr. McAleer, and  
10 Mr. Meeink?  
11 A No, it was a directive. It was -- it was my vision being  
12 communicated to them.  
13 MR. GEEKIE: And would you turn to Defendants' Exhibit  
14 24?  
15 (Counsel conferring.)  
16 BY MR. GEEKIE:  
17 Q Can you identify Exhibit 24, please?  
18 A Yes. This is an email that I sent in 2011, again, to my  
19 partner Arno Michaelis, and copying some of the people that we  
20 had brought on.  
21 It was in relation to a business plan and also a  
22 financial plan that I had created for a project called G  
23 Project, which was in partnership with Google, where both Arno  
24 and I were going online to identify one-to-one people who  
25 appeared radicalized where we would start non-aggressive

1 conversations with them to try and get them to disengage.  
 2 This was an idea that I actually had brought to Google  
 3 and that they developed a plan around.  
 4 Q Now, I see in these emails that were sent out that Ms. King  
 5 isn't shown in any of these.  
 6 Do you have a reason or know why?  
 7 A I don't know why, except that there were over time many  
 8 projects that she decided to not participate in.  
 9 Q And at this time, which is a few weeks after the previous  
 10 exhibit, I see that Mr. McAleer, Mr. Meeink, and Mr. Rangel  
 11 still don't have Life After Hate email addresses. Is there a  
 12 reason for that?  
 13 A That's correct. At that time Arno and I, again, were not  
 14 totally convinced that they would be long-term volunteers, so  
 15 we didn't have Life After Hate emails created for them. And  
 16 there was some question about Mr. Rangel, who kept demanding  
 17 that his wife be copied on all his emails, and that was  
 18 something that I was not comfortable with. And I never really  
 19 got a straight answer from Mr. Rangel on why his wife needed to  
 20 be copied on private confidential emails.  
 21 Q I notice a little ways down, there is, on the first page  
 22 there, there's an email from Mr. Rangel that says, "Where is  
 23 the bus?" What does that mean? If you know.  
 24 A I do know.  
 25 Ever since I met Sammy in Ireland, there's been one

1 ridiculous request after another. And for several months, he  
 2 kept demanding that we write in a bus into our financial plan.  
 3 He had an idea of taking a bus around the U.S. And this is in  
 4 several emails, several personal discussions. And I believe  
 5 this is the same email thread where I had to tell Mr. Rangel  
 6 to, you know, please, let's stop talking about the bus.  
 7 Q And at this time in 2011, who was providing the financial  
 8 support for Life After Hate as you were transitioning into a  
 9 501(c)(3)?  
 10 A Exclusively me and Mr. Michaelis, and I would say I  
 11 provided the lion's share of the funding out of my personal  
 12 pocket.  
 13 MR. MONACO: Your Honor, I'd move for the admission of  
 14 Exhibit -- Defendants' Exhibit 24.  
 15 MS. SAPER: No objection.  
 16 THE COURT: Okay. It will be admitted.  
 17 (Said exhibit received in evidence.)  
 18 BY MR. GEEKIE:  
 19 Q Defendants' Exhibit 10, please. Exhibit 10 has already  
 20 been admitted. But I'd like to ask you briefly about it.  
 21 Mr. Piccolini, can you identify this document?  
 22 A Yes. This is a document that I created probably around  
 23 2012, based on the address of the company at the time.  
 24 Q And it identifies you as a cofounder, but it doesn't  
 25 identify Meeink, McAleer, or King as cofounders. Is there a

1 reason for that?  
 2 A That would be because they are not cofounders of the  
 3 organization, nor were they considered by either me or  
 4 Mr. Michaelis as cofounders.  
 5 MR. GEEKIE: Your Honor, it's been pointed out to me  
 6 that I may have overlooked asking for the admission of  
 7 Exhibit 10 on Friday, so I move for its admission now.  
 8 THE COURT: I don't know what it is. I have to look  
 9 at it.  
 10 Is it the one that's up there right now?  
 11 MR. GEEKIE: It should be, your Honor, yes.  
 12 THE COURT: Any objection?  
 13 MS. SAPER: No, your Honor.  
 14 THE COURT: Okay. It will be admitted.  
 15 (Said exhibit received in evidence.)  
 16 THE COURT: Let's take a break, okay?  
 17 Let's take a long enough one to get lunch, so let's  
 18 say 20 minutes after 2:00. Okay? 30-minute break?  
 19 Thank you.  
 20 LAW CLERK: All rise. Court is in recess.  
 21 (Lunch recess taken from 12:51 p.m. to 1:25 p.m.)  
 22 (Proceedings heard in open court:)  
 23 THE COURT: Please be seated. My clerk reminded me I  
 24 said after 2:00, and I thought that's not what I meant, so I'm  
 25 glad you all came back.

1 (Witness resumes the stand.)  
 2 THE COURT: Sir, you're still under oath. Do you  
 3 understand that?  
 4 THE WITNESS: Yes, I do.  
 5 THE COURT: Okay. You can continue.  
 6 MR. GEEKIE: Please pull up Exhibit -- Plaintiff's  
 7 Exhibit 57.  
 8 BY MR. GEEKIE:  
 9 Q Mr. Piccolini, do you recognize Plaintiff's Exhibit 57?  
 10 A Yes, I do.  
 11 MR. GEEKIE: Your Honor --  
 12 BY MR. GEEKIE:  
 13 Q Would you describe it for me, please, Mr. Piccolini?  
 14 A It is an email that I sent to Mr. McAleer and Ms. King  
 15 instructing them after a period of some really low morale that  
 16 they should add "cofounder" to their titles.  
 17 MR. GEEKIE: Your Honor, I would move for the  
 18 admission of Exhibit -- Plaintiff's Exhibit 57 at this time.  
 19 THE COURT: Any objection?  
 20 MS. SAPER: No, your Honor.  
 21 THE COURT: Okay.  
 22 (Said exhibit received in evidence.)  
 23 BY MR. GEEKIE:  
 24 Q And why did you send this email?  
 25 A Well, this would have been the period after Mr. Michaelis

1 was fired. The organization itself had gone dormant for a few  
 2 months, meaning that there really wasn't very much business  
 3 being conducted other than the intervention work that I was  
 4 doing on the side. And this was an attempt to restructure the  
 5 organization to make it fully about exit programming. And I  
 6 was always very interested in empowering the formers that I  
 7 worked with, and this was one way to do that.  
 8 Q Just so we have the time frame right, would you look at the  
 9 date of this exhibit?  
 10 A Yes. August 12th, 2016.  
 11 Q Is that -- that isn't around the time that Mr. Michaelis  
 12 left, though, is it?  
 13 A No. It's a few years after.  
 14 Q Okay. But was it your intent to, as you said, empower  
 15 Mr. McAleer and Ms. King?  
 16 A It was -- it's always been my intent to empower all the  
 17 formers that I work with, and this was one way to do that. You  
 18 know, they were volunteers. They were somewhat engaged at the  
 19 time. But this was an attempt to make the organization seem a  
 20 little bit bigger as we were doing grant proposals and things  
 21 like that.  
 22 Q And at the time you sent this, did you actually believe  
 23 that they were cofounders?  
 24 A No.  
 25 Q Did you believe that they were doing good work for the

1 organization at this time, the date of Exhibit 57?  
 2 A Yes, I did.  
 3 Q Now I'd like to discuss ExitUSA.  
 4 Who created the term "ExitUSA"?  
 5 A I did.  
 6 Q Is there anything special or magical about it that led you  
 7 to create the term "ExitUSA"?  
 8 A "Exit" is a generic term that's used for exit programming  
 9 that's used all over the world. There is a group called Exit  
 10 Germany. There's an Exit Sweden. I helped launch Exit U.K.  
 11 and also Exit Slovakia. None of those groups are connected to  
 12 each other, but it's just understood that that is a generic  
 13 term for the type of work we do.  
 14 Q And how did your decision to use "ExitUSA" come about?  
 15 A I had visited with Exit Sweden prior to launching ExitUSA.  
 16 And in sitting with them, I observed some of their processees  
 17 and incorporated them with my own. And being in the  
 18 United States, it just made sense to attach that more generic  
 19 word to USA.  
 20 Q Now, you said you witnessed their processees.  
 21 Do you consider ExitUSA a product that Life After Hate  
 22 sold or a process?  
 23 A It's a process.  
 24 Q What do you mean by a process?  
 25 A The exit process, the one that I used for ExitUSA, was a

1 process of listening, linking, learning, leveraging, and  
 2 helping people live. That's the six-step process that I used  
 3 with people. But it was never sold, never charged money for  
 4 it. It was always a pro bono service that I provided.  
 5 Q Did you hold a position with respect to ExitUSA?  
 6 A I had the title of program director.  
 7 Q And is it fair to say then that ExitUSA was a program that  
 8 was run by Life After Hate?  
 9 A That is correct, yes.  
 10 Q Why were you the program director?  
 11 A Well, I had done the work of ExitUSA without using that  
 12 name for many, many years, since 2000, and then also when I was  
 13 with -- when I cofounded Life After Hate in 2009.  
 14 And, yeah, I mean, I just had been doing them, so I  
 15 was the one who took that on. Nobody else at Life After Hate  
 16 had been doing interventions at the time.  
 17 Q Now, you mentioned nobody was doing interventions at Life  
 18 After Hate at the time. That was at the time you started  
 19 ExitUSA?  
 20 A Correct, and also before then as well.  
 21 Q What was the time period again when you started ExitUSA?  
 22 A About 2014.  
 23 Q And into 2015 and '16, were people at Life After Hate other  
 24 than you doing any kind of interventions or exit programming?  
 25 A I was the only one doing face-to-face interventions with

1 people. At times I needed support. In case there was a  
 2 situation with a female, I would enlist somebody like Angela to  
 3 help. So there were instances where I asked for a little bit  
 4 of support, but they were playing a support role.  
 5 Q And did you hear Mr. Rangel talk about a Robert Orell?  
 6 A Yes.  
 7 Q And do you have an understanding of any support services or  
 8 interventions that Mr. Orell is doing right now for Life After  
 9 Hate, if you know?  
 10 A I am not aware of any work that he's doing with Life After  
 11 Hate.  
 12 Q Have you visited his website?  
 13 A I visited his organization's website in Sweden and also  
 14 his.  
 15 Q Did you see any reflection of Life After Hate on that  
 16 website?  
 17 A None. There's no mention of Life After Hate.  
 18 Q There were some questions to you about Mr. Michaelis  
 19 leaving Life After Hate, an email showing that you asked him to  
 20 control -- return control of the intellectual property. Do you  
 21 remember those questions?  
 22 A I do.  
 23 Q And can you explain to us why you asked Mr. Michaelis to  
 24 return control of those to the organization?  
 25 A Well, Mr. Michaelis had been asked to leave the



1 organization, and he didn't claim any -- any ownership of those  
 2 assets, most of which I had created.  
 3 Q And was it your intention by asking him to return those  
 4 assets to the organization that you were donating them to the  
 5 organization?  
 6 A I'm not sure I understand the question. The assets that I  
 7 created I donated --  
 8 Q Yes.  
 9 A -- that license --  
 10 Q Pardon me?  
 11 A I licensed them without a fee to the organization.  
 12 Q You allowed the organization to use your intellectual  
 13 property you created.  
 14 A Correct, yes.  
 15 Q Did you ever sign any documents transferring ownership of  
 16 any intellectual property you created to Life After Hate?  
 17 A Never.  
 18 Q Exhibit -- Defendants' Exhibit 13. Would you look -- would  
 19 you look at Defendants' Exhibit 13, please? And tell me if you  
 20 can identify it.  
 21 A This is an email between one of the members of the Gravity  
 22 Tank, which was the ad agency that provided pro bono services  
 23 discussing the logos that I had designed and some of their  
 24 finalizations of it.  
 25 Q And when you say the logos you had designed, is there a

1 Q And there was some discussion about creation of public  
 2 service announcements and videos. And I think one of the  
 3 plaintiff's complaints is that you have a video up on your  
 4 website or Free Radicals' website. Is that your understanding?  
 5 A Yes, I have my copyrighted video up on my website.  
 6 Q What is the name of that video?  
 7 A It is called "There is Life After Hate."  
 8 MR. GEEKIE: And could we pull up Exhibit 14, please?  
 9 BY MR. GEEKIE:  
 10 Q Exhibit 14, would you please look at this exhibit and tell  
 11 me if you can identify it?  
 12 A This is an email between my personal email and one of my  
 13 good friends, Michael Racanelli, who is from Chicago but lives  
 14 in Los Angeles. He's a film maker. And this is an email with  
 15 me and him discussing the studio, I believe, where we shot some  
 16 of the footage, and him asking me -- him giving me some quotes  
 17 for how much money it would cost me to pay for the studio.  
 18 Q And, I apologize, maybe I missed -- missed it in your  
 19 answer, but which video was this email for?  
 20 A Sorry. This was for the "There is Life After Hate" video  
 21 that I won an Emmy award for.  
 22 MR. GEEKIE: Okay. Move for the admission of  
 23 Exhibit -- Defendants' Exhibit 14, your Honor.  
 24 THE COURT: Okay. It will be admitted.  
 25 (Said exhibit received in evidence.)

1 discussion with -- in the email from Gravity Tank regarding  
 2 your design?  
 3 A Yes. It says here, "This is a cleaned-up version of  
 4 Christian's logo that integrates the type treatment. It plays  
 5 off the life rune and peace sign more literally," which was a  
 6 design that I had submitted, and they added the proper font,  
 7 because it needed to be purchased, but the design itself was  
 8 mine, and they just tweaked it color-wise.  
 9 Q And, I apologize, by oversight, I don't have a copy of that  
 10 design with me, but can you describe it to the Court --  
 11 A Yes.  
 12 Q -- what that design was?  
 13 A Well, it's still the same logo that Life After Hate is  
 14 using on their website and all their materials, but it is two  
 15 orange boxes with lines going through it. And if you look at  
 16 the top box, it is a Nordic life rune, which is symbolic to  
 17 people in the movement, but its reflection is actually a peace  
 18 sign that would reflect the opposite of that.  
 19 MR. GEEKIE: Move for the admission of Defendants'  
 20 Exhibit 13, your Honor.  
 21 THE COURT: Okay. Any objection?  
 22 MS. SAPER: No, your Honor.  
 23 THE COURT: It will be admitted.  
 24 (Said exhibit received in evidence.)  
 25 BY MR. GEEKIE:

1 BY MR. GEEKIE:  
 2 Q And this video, "There is Life After Hate," who paid for  
 3 its production?  
 4 A I did.  
 5 Q And who produced the video?  
 6 A I did.  
 7 Q Who edited the video?  
 8 A I did, with some help from my friend Michael.  
 9 Q And I think you said you've copyrighted this video?  
 10 A I copyrighted it. I wrote the script. I voiced it over.  
 11 I created all the intellectual property, including the logo on  
 12 it.  
 13 Q And the complaint is registered in this case by Life After  
 14 Hate of your use of this video, as is it -- that on -- on the  
 15 Free Radicals' site, as we saw on that earlier exhibit, it says  
 16 "There is Life After Hate"?  
 17 A Yes. There -- that's the name of the video, because the  
 18 video itself shows a former extremist and his victim coming  
 19 together both professing that people can change.  
 20 Q And who created the term "There is Life After Hate"?  
 21 A I did.  
 22 MR. GEEKIE: And would you please turn to Defendants'  
 23 Exhibit 15?  
 24 BY MR. GEEKIE:  
 25 Q Can you identify this document, Mr. Piccolini?

1 A Yes. This is an email receipt that I received to my  
2 production company, Goldmill Group, after I registered the  
3 video to be submitted for the Emmy awards.  
4 Q Okay.  
5 MR. GEEKIE: I move for the admission now of  
6 Defendants' Exhibit 15, your Honor.  
7 THE COURT: Okay. It will be admitted.  
8 (Said exhibit received in evidence.)  
9 BY MR. GEEKIE:  
10 Q And, Mr. Piccolini, Ms. Saper asked you about this-- this  
11 document on Friday. And she asked you specifically in the box,  
12 the third line down where it says Title: "Life After  
13 Hate/ExitUSA, There is Life After Hate," do you know why Life  
14 After Hate/ExitUSA was used there?  
15 A It was used because it was for the program -- the video  
16 "There is Life After Hate" was being used for the ExitUSA  
17 program. Because ExitUSA was just a program and not a company,  
18 I listed the Life After Hate name there, knowing that it was  
19 something that could add a little bit of cache for people to  
20 watch the video. But it's very clear that this was made for  
21 the program ExitUSA. It is not the title of the video. It is  
22 the person who I licensed or the organization or the entity  
23 that I licensed the video to for free.  
24 Q And the Goldmill Group, did you say, is that a company that  
25 you own?

1 A That is my company, yes.  
2 Q And do you recall the names of other PSAs or videos that  
3 you copyrighted related to your exit work that you do have  
4 copyrights in?  
5 A Yes. At the same time that I made the "There is Life After  
6 Hate" video, I also made two more videos.  
7 One was called "The Formers," which was a video that  
8 was shot with people's cellphones that had -- and these were  
9 all former extremists -- and it had an image of them from their  
10 past and an image of -- a live video of them now explaining the  
11 conspiracy theories and how it fooled them. And I wrote the  
12 script for that. I edited that video. And, again, the logo  
13 that was at the end was my intellectual property.  
14 There was also another video called "Oak Creek," which  
15 was based on police dash cam footage from a shooting in Oak  
16 Creek, Wisconsin, at the Sikh Temple there in 2014, I believe.  
17 Q Did you copyright those two videos?  
18 A I copyrighted all three. I did the voiceovers for all  
19 three. Created the logos for all three. And nearly edited  
20 almost 100 percent of them.  
21 Q And as far as you're aware, have you ever received any  
22 objection, written or otherwise, from Life After Hate to you  
23 copywriting these three videos?  
24 A Never.  
25 Q Excuse me.

1 Now, did you also create a fundraising video for Life  
2 After Hate?  
3 A I did. When I was with the organization still in October  
4 of 2017, I put together the whole plan for a fundraising --  
5 crowdfunding campaign. We had just been resubmitted our  
6 \$400,000 grant from the government, so we -- so we launched  
7 this campaign that I built.  
8 The video is of me asking for money for crowd  
9 donations, of which we ended up raising, I believe, around  
10 \$850,000.  
11 Q And when was this? Was this in 2017?  
12 A This was from August until the campaign ended, and I  
13 believe the organization had -- was continuing to use my  
14 likeness, my video of me asking for money, for some time after  
15 I was no longer with the organization.  
16 Q Okay. So it was occurring -- it was used in August of  
17 2017?  
18 A I believe it was August of 2017 through September or  
19 October of that same year, of 2017.  
20 Q After you left.  
21 A Correct.  
22 Q And --  
23 A I believe that we actually submitted a cease and desist for  
24 them to take the video down.  
25 Q Let's -- let's go back -- you mentioned a government grant

1 being rescinded. Mr. Rangel had testified about that.  
2 Was Mr. Rangel's testimony about that grant rescission  
3 accurate?  
4 A No, it was not.  
5 Q Why wasn't it?  
6 A Mr. Rangel testified that Life After Hate lost its \$400,000  
7 grant because of a tweet that I had made, which is not correct.  
8 The explanation we were given, as was the whole world,  
9 was that the Trump administration, out of the 33 groups that  
10 had been funded, the Trump administration was cutting out its  
11 focus on white nationalism and focusing solely on ISIS-related  
12 terrorism. And the two groups that were defunded as part of  
13 that were the only two groups that focused on white supremacy.  
14 Q So it wasn't just your organization Life After Hate that  
15 lost its grant; is that right?  
16 A I believe it was the University of Maryland or somebody  
17 like them that also was focused on white supremacy and was  
18 defunded.  
19 Q And so in 2017, did problems start to develop within the  
20 management and the various people running Life After Hate?  
21 A I think problems started before then. Once the decision  
22 was made to let Arno go, there was definitely -- that decision  
23 was led by Mr. Rangel, Mr. McAleer, and Ms. King based on an  
24 event that happened in Southern California -- I'm sorry, not  
25 Mr. Rangel -- Mr. McAleer, Ms. King, and Mr. Meeink based on an



1 event that happened in Southern California. I wasn't there.  
 2 But as the board chair I looked at all the evidence, and I  
 3 decided, against my better judgment, to let Mr. Michaelis go.  
 4 Once that happened, I decided to take the organization  
 5 100 percent into doing intervention work. There were some  
 6 issues.

7 The first issue started -- it started when I received  
 8 anonymously an explicit videotape of Mr. McAleer, allegedly --

9 Q Did you ask Mr. McAleer for an explanation?

10 A I did on multiple occasions.

11 Q Did you ever receive an explanation from --

12 A I never did.

13 I also asked Mr. Rangel on multiple occasions to  
 14 address this pornographic tape that I never received any  
 15 information on.

16 Q And did you have other issues with management at Life After  
 17 Hate?

18 A I did. There were certainly a lot of egos involved. I  
 19 would not consider them management. They were all volunteers.  
 20 Angela King was the only one who was receiving a salary, part  
 21 of which I paid for for most of the time out of my own pocket.

22 But there were issues involving who was doing the  
 23 media work. I was getting a lot of attention from the media.  
 24 They were coming directly to me. And there were some, I  
 25 believe, very jealous feelings over the fact that I was -- that

1 arrested as part of Texas's largest drug sting on a white  
 2 supremacist group. And about a year earlier than that, I had  
 3 aided a woman who was being held captive by the Aryan  
 4 Brotherhood of Texas who was being sex trafficked by them. And  
 5 she got my number. And through text message from Chicago to  
 6 Texas, I was able to get her out of the house and connect her  
 7 with an FBI vehicle that was waiting outside for her.

8 Now, I never knew her name. I didn't know anything  
 9 about her except that she was a woman being held hostage, and  
 10 when she was safe I found that out.

11 But about a year later, an article popped up about  
 12 this specific group. And all I said in the private group was I  
 13 wonder if this has anything to do with that one girl that I  
 14 worked with.

15 Again, I didn't know her name. I never called her out  
 16 specifically. And there were 57 people listed in the article,  
 17 some of which -- many of which were female. So there's no  
 18 possible way that them accusing me of, you know, publishing  
 19 somebody's name is accurate. It's just not accurate.

20 Q Now, you mentioned the private group. What group are you  
 21 discussing or where was this mentioned?

22 A We -- Life After Hate had a Life After Hate private Formers  
 23 Group that was an invite-only page for people that I had been  
 24 working with through intervention and other people who were  
 25 already formers that had kind of graduated to a place where

1 I was the figurehead, the face of Life After Hate.

2 There were also other issues in terms of their claims  
 3 that I did things that were inappropriate, which are unfounded  
 4 Q Was one of those things an alleged disclosure of the name  
 5 of a client?

6 A Yes.

7 Q Can you describe your -- what actually happened there?

8 A Sure. There were two instances.

9 One was -- and I believe the plaintiffs may have  
 10 talked about this yesterday -- or on Friday. But one was an  
 11 incident where they claim I disclosed a name on Twitter of  
 12 somebody, which I never did. I never disclosed anybody's name.  
 13 My tweet was in response to a group called Antifa, which is an  
 14 anti-racist militant group, that was threatening this  
 15 individual who I was working with and whose family I was  
 16 working with. I received permission from the family to then  
 17 address this person who tweeted it, which was part of Antifa,  
 18 to try and alleviate some of the pressure that they were  
 19 facing, but I still never mentioned the person's name. All I  
 20 said was I've already been working with the family. And that  
 21 did relieve some pressure.

22 Another instance was in a private Facebook group that  
 23 I ran for formers to do community support with each other. And  
 24 there was an article in 2017 about an Aryan Brotherhood group  
 25 out of Texas that had been arrested -- 57 people had been

1 they could then provide counseling to other members so it was  
 2 really a community support space. And these were all people  
 3 that I had worked with directly.

4 Q Now, you mentioned earlier that, in your testimony I think  
 5 on Friday, that come August of 2017 when things came to a head,  
 6 shortly before that the Charlottesville incident had occurred.  
 7 And I think you said you were working a lot, 24/7 on that?

8 Can you -- can you describe what you were doing? Very  
 9 briefly.

10 A August 11th and 12th were the days that changed my life.  
 11 It was I think a very poignant moment for the world. And the  
 12 moment that happened, my inbox, my personal inbox, as well as  
 13 My Life After Hate inbox had become flooded with requests from  
 14 family members who were now concerned because of what they had  
 15 learned about their loved ones. And I still am receiving  
 16 emails from that.

17 Q These were people seeking help.

18 A These were people desperately seeking help who were either  
 19 members who were now concerned about their safety. It had been  
 20 the impetus for them to leave. It was also from family  
 21 members. And also the general public who was just trying to  
 22 understand what had just happened.

23 Q And what happened then with respect to you at LAH, Life  
 24 After Hate, and your email there?

25 A Ten days later, my -- I woke up one morning and my email

1 had been cut off. The bank accounts had been switched out of  
2 my name and moved to different banks. The databases and  
3 spreadsheets that I used to track -- to track the interventions  
4 that I was doing, I couldn't have access to them anymore. And,  
5 in fact, I also lost access to the private Formers Support  
6 Group where I was counseling these people, and they had no  
7 contact -- most of them, 90 percent of them had no contact with  
8 any other member or volunteer of Life After Hate.

9 Q Do you believe that these various things -- let me put it  
10 this way.

11 Did you have any prior warning that these things were  
12 going to happen where you would be cut off from your contacts  
13 and your data and your clients?

14 A None. The only warning that I had was one that I had given  
15 them because for months I had tried to address the issues of  
16 several things that were happening in Life After Hate that I  
17 believed were detrimental to the organization. So the only  
18 warning that I had was given to them. And the only response I  
19 got from them was a stonewall that refused to address my  
20 issues.

21 Q And do you believe that being cut off from this information  
22 and data could possibly be harmful to your clients?

23 A Well, I know for a fact that it was because I have met  
24 people who have said that they've emailed Life After Hate even  
25 within days after me leaving, up until I still get emails from

1 A Yes, I do.

2 Q What is it?

3 A This is an email from me to Sammy Rangel. Again, it's on  
4 my personal email because I didn't have access to the Life  
5 After Hate email after being cut off from it. But this was my  
6 attempt to try and save the mission of Life After Hate. I  
7 believed so strongly in the mission and in the organization  
8 that me and Arno had built for many, many years, almost ten  
9 years at that point, that I was not willing, because I knew of  
10 the scrutiny that was on formers doing this work, I was not  
11 willing to destroy the mission, even though I didn't believe in  
12 the people that were still there.

13 But this is an attempt for me to try and have an  
14 amicable split. To put out a press release so there was no  
15 confusion going forward and so that people, if they needed  
16 help -- because I was getting new requests from new people  
17 every day -- so that they could contact me because I knew they  
18 were not providing those services that could save lives.

19 Q And did you believe that this was a fair offer to  
20 compromise this dispute?

21 A I've always believed that this is open source, that we need  
22 as many people doing this work of deradicalization and  
23 disengagement as possible.

24 This is not something that I want to do alone. But I  
25 believe that this was fair because I had literally just raised

1 people that say, hey, I just donated to your organization Life  
2 After Hate. And I have to explain to them that I'm no longer  
3 there, even though it's explicit all over my sites. But one  
4 person specifically ended up dying after that happened because  
5 they couldn't get in contact with me. Was murdered.

6 Q And did you try when you -- well, getting cut off from your  
7 information like this, did that make you mad or enrage you?  
8 A Yeah, I was angry. But I was also extremely sad because I  
9 knew that I had built connections with these people, that they  
10 were making good progress, and now I had disappeared. They  
11 could not get ahold of me.

12 So, yes, I was angry. But I was also very sad and  
13 disappointed in the people that I had put faith in.

14 Q Is that what led to some of the terse emails that you  
15 exchanged with Mr. Rangel that you were examined about by  
16 Ms. Saper?

17 A Yes. Unfortunately, yes.

18 Q Were you ever given access to your email accounts or your  
19 data so that you could buy Life After Hate after you were  
20 terminated so that you could resume treating your clients?

21 A No. I was promised I would, but that never happened.

22 MR. GEEKIE: Now, let's turn to Defendants' Exhibit  
23 16, please.

24 BY MR. GEEKIE:

25 Q Do you recognize this document?

1 almost \$850,000 for the organization. I think at this point,  
2 it was around 575. But in the days after that, it went to 850.  
3 And I had asked for \$50,000 worth of seed money to incorporate  
4 that organization and move forward, believing that, you know,  
5 they would see that as a benefit to have other partners or  
6 other groups doing this.

7 Q And did you feel that you got an adequate response to your  
8 proposal from Mr. Rangel?

9 A Well, initially I received an email that said he would take  
10 it back to Life After Hate. And then I never heard from him  
11 except for on a text message where he said he blocked me and he  
12 didn't want to hear from me anymore.

13 Q Do you know if Life After Hate ever issued a press release  
14 that you had left?

15 A They did not. And I asked several times for them to do  
16 that.

17 Q And you mentioned the fundraising that was going on.

18 Was Life After Hate using your fundraising video at  
19 the time that you were dismissed?

20 A They were using the video that I had created with my  
21 likeness, speaking and asking for money, and only my likeness  
22 asking for that for a few weeks before I left and then for  
23 several weeks after I was let go.

24 Q Now, going back to the video, why were you the one that  
25 made the video or were featured in the video?

1 A At the time, I was the face of Life After Hate. Everybody  
 2 who contacted Life After Hate thought they were contacting me.  
 3 Most people were not aware that Life After Hate was anything  
 4 but the work that I was doing.  
 5 Q Did you believe then that after you left and Life After  
 6 Hate continued to use your video that they were raising money  
 7 on your likeness?  
 8 A Absolutely.  
 9 Q Do you think what they did caused confusion to the public  
 10 and the donating public?  
 11 A Absolutely. I got requests from several people who said I  
 12 just donated to your organization, you know, thanks for what  
 13 you do. And it wasn't until I was able to tell them that I was  
 14 no longer with the organization, so there were a lot of upset  
 15 people who believed they were donating to my organization, and  
 16 the money was going elsewhere.  
 17 MR. GEEKIE: And if you turn to Defendants' Exhibit 7,  
 18 please.  
 19 BY MR. GEEKIE:  
 20 Q Can you identify this document?  
 21 A I'm not quite sure if I've seen this, but I'm aware of the  
 22 content of it.  
 23 Q Well, did you ask your attorneys to send a letter to Life  
 24 After Hate to tell them to stop using your video?  
 25 A Yes, I did.

325

Piccolini - Cross by Geekie

1 Q And was it your understanding that your attorneys did send  
 2 a letter to Life After Hate to not use your video?  
 3 A Yes, I received copyrights for three of those videos, three  
 4 of the three.  
 5 Q Well, I'm talking about not only the three videos, but the  
 6 fundraising video.  
 7 A Yes. All the videos that I created.  
 8 Q Are you aware of any communication from Life After Hate  
 9 where they denied using the fundraising video after you had  
 10 left?  
 11 A No.  
 12 Q Have you ever done anything since leaving Life After Hate  
 13 to intentionally or to try and cause confusion with either  
 14 clients or the donating public that you were still associated  
 15 with Life After Hate?  
 16 A No. In fact, I've done quite the opposite. I've been very  
 17 vocal about my disconnection from Life After Hate. And I have  
 18 gone out of my way to specifically make sure that there is no  
 19 confusion, although people still email me to this day confused  
 20 about the association.  
 21 MR. GEEKIE: Your Honor, Defendants' Exhibit 16, which  
 22 was the email from Mr. Piccolini to Mr. Rangel proposing the  
 23 split, I'd move for the admission of that. I overlooked doing  
 24 it.  
 25 THE COURT: Okay. It will be admitted.

326

Piccolini - Cross by Geekie

1 (Said exhibit received in evidence.)  
 2 BY MR. GEEKIE:  
 3 Q Now, there were some questions to you about redirecting  
 4 ExitUSA to Free Radicals.  
 5 Was that done with the intention to cause confusion?  
 6 A No.  
 7 Q Whose interest did you have in mind when you initially set  
 8 up that redirection? Which I think you described as occurring  
 9 at or prior to you leaving.  
 10 A The people that I was working with. The ones who were  
 11 contemplating suicide or who were completely lost after  
 12 Charlottesville had happened, it was absolutely critical that  
 13 they not be cut off from the support that they had at such a  
 14 critical time.  
 15 Q In any confusion that's arisen here either with clients,  
 16 those needing services, or those making donations, in your  
 17 view, whose responsibility is that confusion caused by?  
 18 A I believe it's Mr. Rangel and Mr. McAleer, Ms. King, and  
 19 Mr. Meeink, and those who are operating as Life After Hate now.  
 20 Q And why is that?  
 21 A Because they have not -- they refused on multiple occasions  
 22 to make it clear to the public that there was a separation.  
 23 There were instances on their website that misled people. They  
 24 continued to use my video and me as the face of Life After Hate  
 25 well after I was no longer with the organization. And I also

327

Piccolini - Redirect by Saper

1 believe that they're not communicating with the public about  
 2 people who email them about me because I have not received one  
 3 email forwarded from Life After Hate, when I had received at  
 4 least 99 percent of all the emails that came in up until that  
 5 day.  
 6 MR. GEEKIE: I have no more questions, Judge.  
 7 THE COURT: Okay. Redirect.  
 8 REDIRECT EXAMINATION  
 9 BY MS. SAPER:  
 10 Q Let's go back to the -- I didn't catch the exhibit number,  
 11 but it's the LinkedIn page. I believe it was defendants' first  
 12 admitted document.  
 13 MS. SAPER: Do you guys have the number of your  
 14 LinkedIn exhibit? The first one you used?  
 15 (Counsel conferring.)  
 16 MS. SAPER: Number 20, I think it was.  
 17 MR. GEEKIE: That's it.  
 18 MS. SAPER: This is ours. I just wanted to use yours.  
 19 MR. SCHULTIS: 20.  
 20 MS. SAPER: It was 20?  
 21 Okay. Do you want to use theirs?  
 22 Exhibit 20 was previously entered by defendants'  
 23 counsel. It's Mr. Piccolini's LinkedIn account.  
 24 We also have a screenshot of the same one.  
 25 We can use ours. Is that ours?

Piccolini - Redirect by Saper

Piccolini - Redirect by Saper

1 MR. MONACO: Yes.  
 2 MS. SAPER: Yes.  
 3 BY MS. SAPER:  
 4 Q Christian, you testified that you updated your profile to  
 5 explain that you are the founder, not the cofounder, of  
 6 ExitUSA; is that correct?  
 7 A ExitUSA is a program.  
 8 Q That's not my question.  
 9 You stated that you're the sole founder of ExitUSA in  
 10 your LinkedIn program -- in your LinkedIn page; is that  
 11 correct?  
 12 A I think that's accurate, yes.  
 13 Q Yeah. And then you said that you ceased being the founder  
 14 or at least affiliated with ExitUSA in September of 2017; is  
 15 that correct?  
 16 A I don't believe I had a choice to stop being affiliated  
 17 with it. It was -- all the assets had been taken away, my  
 18 spreadsheets that contained all the interventions that I was  
 19 doing were, so I began operating on my own after that.  
 20 Q So you operate on your own, but you have asserted that you  
 21 own the "ExitUSA" domain name and platform, which you did  
 22 continue to divert to your ChristianPiccolini.com website; is  
 23 that correct?  
 24 A Correct. I -- the domain that I owned, the logo that I  
 25 created, my intellectual property, the video that I created

1 Q Exhibit 11 has -- is a forward of an email chain -- no,  
 2 that's not --  
 3 MR. MONACO: Okay.  
 4 MS. SAPER: I don't know which one --  
 5 (Counsel conferring.)  
 6 MS. SAPER: What was the second document you guys  
 7 submitted into evidence?  
 8 MR. GEEKIE: LAH13? Exhibit 13.  
 9 MS. SAPER: Did I write down the wrong number?  
 10 (Counsel conferring.)  
 11 BY MS. SAPER:  
 12 Q All right. So Exhibit 13 is what's previously submitted by  
 13 defendants into evidence. It was about an email chain where  
 14 you were pointing to the actual email addresses.  
 15 But in that chain, there's an email from Arno  
 16 Michaelis to Angela King where he's saying: "Interesting  
 17 thread here. I was so spotlight-adverse that I wanted to make  
 18 Christian the public face of Life After Hate, in which he said  
 19 you are the impetus or founder of LAH. Use a pseudonym if you  
 20 want, but please don't make it sound like I came up with the  
 21 concept."  
 22 That's an email from Arno regarding his  
 23 interpretation. And it says, unlike what you're alleging, that  
 24 he was the founder of Life After Hate and that you were not a  
 25 cofounder. In fact, in your own words, you told him to take

Piccolini - Redirect by Saper

1 that was also my intellectual property, as well as the process  
 2 that I used to help people, yes, that -- that was the ExitUSA  
 3 that I founded, and it was the process that I took and  
 4 continued to work with, yes.  
 5 Q But it doesn't say August 2014 to present. There's a clear  
 6 demarcation that you wrote stating ExitUSA is no longer  
 7 something you are associated with in September of 2017.  
 8 A That's correct.  
 9 Q Okay.  
 10 A I was no longer associated with Life After Hate and ExitUSA  
 11 at that time. And I suspect that had I continued these dates,  
 12 you would be asking me now why I still had a continuation of  
 13 those dates.  
 14 Q Absolutely we're asking you --  
 15 A I was more interested in the process and continuing with  
 16 Free Radicals Project at that time rather than arguing over a  
 17 name.  
 18 (Counsel conferring.)  
 19 MS. SAPER: I'd like to pull up Defendants' Exhibit 11  
 20 next.  
 21 BY MS. SAPER:  
 22 Q Christian, you testified that Arno considered you and  
 23 himself the cofounders of the Life After Hate organization; is  
 24 that correct?  
 25 A That is absolutely correct, yes.

Piccolini - Redirect by Saper

1 credit for the creation of Life After Hate.  
 2 A What I was speaking about was the online journal portion of  
 3 Life After Hate here, not the intervention portion or Life  
 4 After Hate in general.  
 5 And unless Mr. Michaelis is here to testify to that,  
 6 I'm not sure what else to tell you.  
 7 Q Well, Mr. Michaelis isn't here to testify, but he's  
 8 certainly written several books. Are you familiar with his  
 9 work as an author?  
 10 A Yeah, I proofread his first one, "My Life After Hate." I  
 11 have not, unfortunately, read the second one. But I'm also a  
 12 published author. I'm not sure what -- how that's relevant.  
 13 Q Mr. Michaelis has written a book called "The Gift of Our  
 14 Wounds," which we're using here -- it's projected on the screen  
 15 right now only to serve as impeachment evidence.  
 16 And in that book, he's stating the history of Life  
 17 After Hate. He says --  
 18 MR. GEEKIE: Objection, your Honor. Objection.  
 19 THE COURT: Yes, you're using it improperly, so  
 20 sustained.  
 21 Go ahead and try again.  
 22 BY MS. SAPER:  
 23 Q Are you familiar with Arno's book, "The Gift of Our  
 24 Wounds"?  
 25 A I am not.

1 Q Okay. Are you aware that Arno doesn't believe and has  
2 published books that state he is the sole founder and that you  
3 are merely a volunteer and someone he solicited to help him  
4 launch his book?  
5 A No, I am not aware of that.  
6 Q Okay. But there is at least one email that we've pointed  
7 to where you state that he's the founder of the, at the  
8 minimum, the website and not you; is that correct?  
9 A I don't recall if that was my exact statement.  
10 Q That he should -- okay, let's move on.  
11 You allege that "exit" is a generic term; is that  
12 correct?  
13 But you still sought to register that name for  
14 yourself to be the proprietor and owner of the ExitUSA  
15 trademark, correct?  
16 A Yes. I would have to register a website with that term,  
17 but I was also aware it was a generic term, yes.  
18 Q You were aware it was a generic term, yet you sought a  
19 federal trademark registration for a generic term?  
20 A For the logo. For the -- for my intellectual property,  
21 yes, for the mark --  
22 Q You didn't get the trademark, though, did you?  
23 A No, because I believe your clients illegally registered it.  
24 Q Life After Hate did get the federal trademark  
25 registrations, correct?

1 A We filed for them at the same time and I believe that your  
2 clients registered it illegally.  
3 Q Tony went to Europe before you did to do some investigation  
4 into programs that used the Exit brand, didn't he?  
5 A No.  
6 Q A full one and a half years before you went to Europe to  
7 meet with anyone involved in the Exit space; isn't that true?  
8 A That's not correct. I've been going to Europe doing this  
9 work for probably a decade.  
10 Q You stated that you've designed certain logos, but we  
11 haven't seen any of the emails of your sketches or alleged  
12 designs, have we?  
13 A I believe we have, yes.  
14 Q You have -- you reference these videos. But these videos  
15 were, in part, funded by an external organization, weren't  
16 they?  
17 A I believe the fourth video that Mr. McAleer created with a  
18 company in Canada was created with funds from that.  
19 Q Is it your position that the Institute for Strategic  
20 Dialogue did not help fund these videos?  
21 A They helped fund the advertising for those videos. That's  
22 my understanding.  
23 Q So your understanding is the Institute for Strategic  
24 Dialogue did not give Life After Hate, the non-profit  
25 organization, funds to help create and promote these videos?

1 A That's not what I said. I believe that they may have  
2 funded the fourth video that Mr. McAleer made, and they  
3 provided some in kind advertising through some partners like  
4 Facebook and Twitter and YouTube.  
5 I am not aware of any other funds that they put in  
6 towards the video. And I know this because I paid for the  
7 videos.  
8 Q Who is Strange Loop?  
9 A Strange Loop is a production company based in Chicago who  
10 did the final mastering on "The Formers" video that I created.  
11 Q And although you created it, Strange Loop's contract is not  
12 with you. It's with Life After Hate, the organization, isn't  
13 it?  
14 A That was an invoice that you showed. It was not a  
15 contract. It was a quote. I went to several companies to get  
16 quotes for that.  
17 Q We have the contract. We'll bring it into evidence later.  
18 A Okay.  
19 Q You stated that you -- I'm sorry.  
20 You've copyrighted these videos, correct?  
21 A Yes.  
22 Q But you only filed for those copyrights after you were  
23 terminated from Life After Hate; isn't that correct?  
24 A I didn't feel the need to do it before then because they  
25 were my intellectual property, just like the rest of the Life

1 After Hate intellectual property was. And I didn't think that  
2 anybody would make a claim against them --  
3 Q And you --  
4 A -- fraudulently.  
5 Q -- didn't copyright them in Goldmill's name, your  
6 corporation, did you?  
7 A Well, I believe that they were copyrighted the minute that  
8 they were released, the minute that I created them and put them  
9 out to the public. But I don't recall who I -- what name I  
10 used. I would have either used my own name or Goldmill,  
11 likely.  
12 Q You have a tough time distinguishing between yourself and  
13 the companies you run, don't you?  
14 A Well, for all of my companies that I run, I'm the only  
15 member, so there's really no --  
16 Q You have a tough time distinguishing between the entity and  
17 yourself.  
18 A No. I don't. I know that the work that I do, and I know  
19 that the company is there for legal structure. It's also there  
20 to protect me in certain cases. But it's also required for me  
21 to do business with certain entities. If that wasn't required,  
22 I would be happy doing this business on my own.  
23 Q You mentioned the pornographic video that you allege  
24 Mr. McAleer is in. You said that you have possession of  
25 something like that; is that correct?



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Picciolini - Redirect by Saper

1 A That is correct. And I believe that Mr. McAleer and  
2 Mr. Rangel have it as well.  
3 Q But you don't know who gave you that video, do you?  
4 A I do not. It was sent to me anonymously.  
5 Q And that anonymous person, you received that video through  
6 a Facebook message? How did you receive that video?  
7 A I believe it was through a Facebook message. And that  
8 account is no longer active.  
9 Q Your Facebook account is no longer active?  
10 A No, mine is.  
11 Q And so the person who sent it to you where is their name?  
12 A Like I said, it was sent anonymously. I don't know if it  
13 was sent to the Life After Hate page, to my personal page, to  
14 the ExitUSA page. I remember getting it on that platform.  
15 Q But you can't remember who you got it from, and there's no  
16 record of who you received it from now.  
17 A The account was deleted. It was sent anonymously.  
18 Q Which account was deleted?  
19 A The person who sent it was deleted.  
20 Q But your receiving of that is not deleted.  
21 A Right, but when a person deletes their account, and I don't  
22 know if you've seen this, when you go back to their old  
23 messages, they're not accessible --  
24 Q I'm not asking you to go back to old messages --  
25 MR. GEEKIE: Objection. The witness is trying to

1 A No, but his voice is very clear, as well as his words.  
2 Q And you have no evidence that Mr. McAleer's voice is on  
3 that video. It's just what you believe is his voice.  
4 A I have no way of seeing Mr. McAleer on the video. But the  
5 words he used are words that describe nationalism in Canada.  
6 They talk about very specific groups that only a former  
7 extremist would know about. It is undeniably his voice.  
8 Q You stated that you forward the "ExitUSA.org" domain name  
9 to yourself, correct?  
10 A I don't know if I understand your question.  
11 Q You forwarded -- you had possession of the "ExitUSA.org"  
12 domain name after you left the organization in 2017, correct?  
13 A Correct. It was the only remaining item that I owned that  
14 I still had in my possession.  
15 Q And then you forward that to ChristianPicciolini.com for a  
16 period of time between August of 2017 and January of 2018,  
17 correct?  
18 A Yes. I believe I testified to that already, yes.  
19 Q Okay. And then you also changed that Twitter address to  
20 say @ExitUSATeamNow@FreeRadicals.org, right? We talked about  
21 that already.  
22 A I'm sorry. You were just talking about the website? Or  
23 are you talking about something --  
24 Q Now I'm talking about the Twitter --  
25 A Twitter.

337

Picciolini - Redirect by Saper

1 answer the question.  
2 THE COURT: He is. Slow down.  
3 Sustained.  
4 BY THE WITNESS:  
5 A When an account is deleted on Facebook, a user account,  
6 what shows up -- and I have many of these because a lot of  
7 people contact me and then go away -- what shows up is a blank  
8 avatar that is unclickable, and then it says that the user is  
9 no longer active. There is no way of me going back to that  
10 email or even seeing a record of it. And if it did come to the  
11 Life After Hate account, I wouldn't have access to that  
12 anymore.  
13 But the moment it came in, I went forward and I said  
14 this is something that the organization cannot withstand. This  
15 is not something that we should do. And it was -- it was --  
16 skirted the issue for a year.  
17 BY MS. SAPER:  
18 Q So for one year, you sat on this video; is that correct?  
19 A I didn't sit on it for a year. I presented it to  
20 Mr. McAleer, who refused to address it. Then I presented it to  
21 Mr. Rangel, who refused to address it. And then I went back to  
22 Mr. McAleer to address it. And then I was fired because I blew  
23 the whistle, and they didn't want it coming out.  
24 Q Mr. McAleer does not appear in this alleged pornographic  
25 video, does he?

339

Picciolini - Redirect by Saper

1 Q -- page.  
2 Both the Twitter -- the Twitter page changed to  
3 reflect Free Radicals. And the "ExitUSA.org" domain name  
4 forwarded from Christian Picciolini, and then instead of  
5 forwarding to Christian Picciolini, it forwarded to  
6 FreeRadicals.org, correct?  
7 A It forward -- the process that I created for ExitUSA was  
8 the same process that I was offering with Free Radicals. It  
9 was my process that I developed, and I never even shared it  
10 with anybody. They couldn't describe it if they tried.  
11 Q To be clear, the domain name forwarded to a new domain  
12 name, not to a process.  
13 A The domain name for a program forwarded to the program that  
14 I had always given.  
15 Q A domain name doesn't forward to a program.  
16 A Yes --  
17 Q It went ExitUSA.org --  
18 COURT REPORTER: Start over, please.  
19 BY MS. SAPER:  
20 Q A domain name by definition doesn't forward to this  
21 nebulous program. A domain name forwards to a different domain  
22 name or website, correct?  
23 A Right, whose website may be a program.  
24 Q Okay. And you said that this in -- so people could find  
25 you --

1 A That's correct --  
 2 COURT REPORTER: Repeat your question.  
 3 BY MS. SAPER:  
 4 Q You said that you did this forwarding, in part, so that  
 5 people could find you; is that correct?  
 6 A I did it so that the people that I was sitting across from  
 7 the week before who were telling me they were considering  
 8 committing suicide, committing violence, walking into a  
 9 synagogue to murder people, could contact me to continue those  
 10 conversations because there was progress. And there couldn't  
 11 be progress to help those people who had only worked for me for  
 12 years if they couldn't find me. So yes.  
 13 Q But you say you're famous and you've had hundreds of videos  
 14 and interviews under your belt. So are you saying that despite  
 15 your fame, it's difficult to find you?  
 16 A I have a tough last name to spell, yes.  
 17 Q Okay. We talked about Charlottesville happening on  
 18 August 11th and 12th, correct?  
 19 A Of 2017, yes.  
 20 Q But as of August 10th, 2017, a full day before these events  
 21 happened, we discussed you offering and stating that you would  
 22 return or that you've tried to return moving back the  
 23 "ExitUSA.org" domain name back to Life After Hate, the  
 24 organization; is that correct?  
 25 A No, that's not correct. I talked about transferring it

1 owned into another account that I owned. It was the last  
 2 priority on my list. My priority was to be prepared for what  
 3 was going to happen and what did happen.  
 4 Q You also discussed the people who are attempting to give  
 5 donations to you, Christian Picciolini, but that instead they  
 6 gave it to Life After Hate, the organization.  
 7 A That's correct.  
 8 Q Who are those people?  
 9 A I don't recall their names, but I'm sure I could produce  
 10 dozens and dozens of emails.  
 11 Q But you haven't produced those emails yet, have you?  
 12 A I don't know if I have or not. I produced everything that  
 13 I thought was relevant that you asked for. But it's not my job  
 14 to produce evidence. It's the attorneys'.  
 15 Q At the beginning of the testimony today, you stated that  
 16 you didn't want Arno to be associated with your organization  
 17 anymore because he had been fired for misconduct; is that  
 18 correct?  
 19 A I was urged by all the other people who were working with  
 20 Life After Hate at the time to do that. And after several  
 21 discussions with Arno, it broke my heart to do that, but I  
 22 couldn't deny the fact that eight other people were saying  
 23 this. And there had been other issues with Arno. You know he  
 24 wasn't perfect. But I did make that decision, and I -- and it  
 25 destroyed our friendship. That was one of the hardest

1 back to My Life After Hate GoDaddy account, which I owned with  
 2 my email address, and removing it so I could corral all the  
 3 assets that were mine for that business into one account.  
 4 Q I'd like to remind you of the previously admitted Exhibit  
 5 48. Life After Hate Exhibit 48.  
 6 Your testimony on Friday with respect --  
 7 Your testimony on Friday was that you intended to  
 8 return the "ExitUSA.org" domain name, along with the others,  
 9 back to Life After Hate. All of the others had already been  
 10 retained -- returned or never removed from the LAH GoDaddy  
 11 account. And with respect to ExitUSA.org, you said that's  
 12 managed through my Google domain, I moved it there when we got  
 13 hacked because it's more secure, but I have tried to move it  
 14 back with problems, I forget what.  
 15 And you testified on Friday that the reason you  
 16 couldn't return it that day is because you were so consumed by  
 17 Charlottesville. But this is a full day before Charlottesville  
 18 took place, isn't it?  
 19 A Yes, but Charlottesville had been announced. I had been  
 20 preparing it for weeks. I knew it was going to be a big thing.  
 21 I had actually been in the media for at least a month prior to  
 22 that warning that it was going to be a big event, that there  
 23 could be violence.  
 24 So my headspace was not on doing administrative work  
 25 to try and put a domain that I owned in one account that I

1 decisions that I ever had to make. And I -- frankly, I regret  
 2 it because I saw now, looking back, that your clients did the  
 3 exact same thing to Arno that they are doing to me now.  
 4 Q Right. And so for the same reasons, you didn't -- it was  
 5 in your words -- in your own words, you stated, "It would have  
 6 been confusing because we fired him for misconduct and I didn't  
 7 want his name attached to the organization," but yet now you're  
 8 asserting that Life After Hate should have announced a big  
 9 press release stating that they endorsed and were okay with you  
 10 spinning off one of their programs. Is that correct?  
 11 A That's correct, but I also had a conversation with  
 12 Mr. Michaelis when he left, and we both agreed not to publicize  
 13 it, that he was just going to go start another organization.  
 14 So it was a completely different scenario. I had asked for  
 15 this to be made public on several occasions, and they refused.  
 16 Q And you stated in your testimony just now that after you  
 17 left, people were confused about your association between you  
 18 know, once you left, were you still associated with Life After  
 19 Hate; is that correct?  
 20 A I received emails from people -- and I'll say this again --  
 21 who donated to the organization, who tweeted, who posted on  
 22 Facebook about the great work that I was doing with Life After  
 23 Hate long after I was not with them anymore. And I had many  
 24 conversations with people to correct that.  
 25 Q But even though you had left Life After Hate, you were



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Picciolini - Recross by Geekie

1 still stating that you were a cofounder of Life After Hate; is  
 2 that correct?  
 3 A I'm still a cofounder of Life After Hate. I don't think  
 4 that that expires. It is not an untruth.  
 5 Q And you were still going on television and allowing the TV  
 6 stations to use captions like "Christian Picciolini, Life After  
 7 Hate." Is that correct?  
 8 MR. GEEKIE: Objection. Foundation.  
 9 THE COURT: Okay. Overruled. It's cross. You can do  
 10 so.  
 11 BY THE WITNESS:  
 12 A I didn't -- I provided bios, the same bio that I provide to  
 13 everybody, that says I am no longer with Life After Hate.  
 14 Whatever they choose to put on the air, I cannot control. And  
 15 I don't see that until it's live.  
 16 And I can tell you that I've had, again, many  
 17 conversations with people after the fact and even before the  
 18 fact to please not do that.  
 19 At that point, I didn't want to be associated with  
 20 Life After Hate, knowing who was left there and the reputation  
 21 they could have left.  
 22 So it -- it was -- it was not something that I was  
 23 interested in being associated with, you know, people who had  
 24 extensive criminal records, who there were alleged videotapes  
 25 about.

1 Q All right. Mr. Picciolini, we -- just so it's clear for  
 2 the record, here's Life After Hate Exhibit 13. And there's a  
 3 logo in the upper left-hand corner.  
 4 Is that the logo that you designed?  
 5 A Yes, it is.  
 6 Q Okay. And Ms. Saper asked you about after your emails were  
 7 cut off and your various other contact information with --  
 8 through Life After Hate, and she seemed skeptical about people  
 9 not being able to contact you.  
 10 Other than through your Life After Hate email, did  
 11 your clients have any other contact information for you?  
 12 A No. Aside from the Life After Hate or contacting me  
 13 through the Life After Hate Facebook page, no, they had no way  
 14 of contacting me. I didn't share my personal email or my  
 15 personal phone number, for that matter, with most people.  
 16 Q And then, lastly, she asked you about Life After Hate  
 17 Exhibit 48, which is a chain of emails in early August, just  
 18 before Charlottesville, where you talked about moving various  
 19 contact or various control of websites and YouTube sites back  
 20 to Life After Hate.  
 21 When you were doing that, did you still believe that  
 22 you owned the intellectual property that was being transferred  
 23 back to Life After Hate's control?  
 24 A Absolutely.  
 25 Q And at the time that you were making these transfers that

345

Picciolini - Recross by Geekie

1 You know, it's my job to help people in their  
 2 positions, and I -- that's one reason why I let them be so  
 3 integral to what I was doing.  
 4 BY MS. SAPER:  
 5 Q You don't want -- you don't want to be associated with Life  
 6 After Hate, but your website prominently displays "Life After  
 7 Hate" all over it, the Free Radicals Project website, doesn't  
 8 it?  
 9 A You're misunderstanding me. I don't want to be associated  
 10 with the people that are currently at Life After Hate. I  
 11 believe in Life After Hate because I helped develop it with  
 12 Mr. Michaelis. I've always believed in the mission. And if  
 13 you were to show the parts of these emails that you're not  
 14 showing that says I believe in the mission of Life After Hate,  
 15 let's please do something so we can both move forward with our  
 16 missions because I don't want to destroy yours, you would see  
 17 that.  
 18 MS. SAPER: No further questions.  
 19 THE COURT: Okay. Anything else on that?  
 20 MR. GEEKIE: Yes, just a couple.  
 21 THE COURT: Okay.  
 22 MR. GEEKIE: VGA, Judge.  
 23 Not our 13.  
 24 RECROSS-EXAMINATION  
 25 BY MR. GEEKIE:

347

Picciolini - Further Redirect by Saper

1 are discussed in Exhibit 48, had you -- or did you know that  
 2 you had -- were going to be fired or have your email and other  
 3 contact information cut off?  
 4 A Absolutely not.  
 5 MR. GEEKIE: Okay. No more questions.  
 6 THE COURT: Anything on that?  
 7 MS. SAPER: Just quickly.  
 8 FURTHER REDIRECT EXAMINATION  
 9 BY MS. SAPER:  
 10 Q You stated that it was difficult for these people you were  
 11 working with to find you after you were cut off from Life After  
 12 Hate. Is that correct?  
 13 A Yes.  
 14 Q But members of the media could find you rather easily,  
 15 couldn't they?  
 16 A I would say members of the media are a little bit more  
 17 savvy at tracking people down than the average white  
 18 nationalist, yes.  
 19 Q Your Christian.Picciolini.com website was live in September  
 20 of 2017, correct?  
 21 A Yes, but I'm sure that most people in this room would have  
 22 a hard time spelling my last name, let alone people who are  
 23 struggling.  
 24 Q Your Instagram page was live; is that correct?  
 25 A Yes. Same issue. But that's not -- that was not public.

1 That's usually something I keep private.  
 2 Q Your Twitter account was live.  
 3 A I believe so, yes.  
 4 Q Your YouTube account was accessible and live.  
 5 A Again, they all had my name as the URL, which, to the  
 6 average person -- and I know this because I've dealt with it my  
 7 whole life -- is a very difficult thing to spell my name  
 8 correctly.  
 9 MS. SAPER: Okay. No further questions.  
 10 THE COURT: Okay. All right then. You can step  
 11 down --  
 12 THE WITNESS: Thank you.  
 13 THE COURT: -- and rejoin the table.  
 14 (Witness excused.)  
 15 THE COURT: We'll take a five-minute break. We're  
 16 going until 3:30 today. Okay?  
 17 LAW CLERK: All rise. Court is in recess.  
 18 (Recess taken from 2:29 p.m. to 2:37 p.m.)  
 19 THE COURT: Please be seated.  
 20 You can call your next witness.  
 21 MS. SAPER: I'd like to call Mr. Tony McAleer.  
 22 THE COURT: Okay.  
 23 (Approaching.)  
 24 THE COURT: There's a cup on the witness stand that  
 25 you might want to remove.

1 to talk to a Canadian former to get Canadian tax breaks for the  
 2 documentary.  
 3 Q Do you have a past in being involved with the white  
 4 supremacist movement?  
 5 A Yes, I do. I spent about 15 years of my life, between '83,  
 6 '84, till about 1998.  
 7 Q And what made you leave that ideology?  
 8 A In 1996, '97, I became a single father with two children.  
 9 The birth of those children really is what sparked the  
 10 change -- change in me. They allowed me to open my -- my heart  
 11 and thought, because I was pretty closed off, completely closed  
 12 off to it at the time. And through their compassion and the  
 13 compassion of other people, I was able to make a transformation  
 14 and wanted to help people to do the same thing.  
 15 Q And what took you to the Dublin conference?  
 16 A Arno invited me. I had been in many contacts with -- in  
 17 conversations with Arno from back to sometime in 2010 and he  
 18 got me invited to Dublin.  
 19 Q Can you remind us -- Mr. Piccolini told us what it was --  
 20 but can you remind us what the Dublin conference was?  
 21 A It was The Summit Against Violent Extremism put on by  
 22 Google Ideas, Tribeca Films --  
 23 COURT REPORTER: I'm sorry --  
 24 BY THE WITNESS:  
 25 A Sorry. The Summit Against Violent Extremism put on by

1 Counsel, there's a cup on the witness stand that you  
 2 should remove.  
 3 Just throw it in the garbage.  
 4 Please raise your right hand.  
 5 (Witness duly sworn and takes the stand.)  
 6 TONY McALEER, PLAINTIFF'S WITNESS, SWORN  
 7 DIRECT EXAMINATION  
 8 BY MS. SAPER:  
 9 Q Good afternoon, Mr. McAleer.  
 10 A Good afternoon.  
 11 Q You've flown here from Vancouver twice in the last four  
 12 days, haven't you?  
 13 A Yes, twice. Yes.  
 14 THE COURT: Why didn't you just stick around? It's a  
 15 great city.  
 16 THE WITNESS: It's a long story.  
 17 THE COURT: I'm just joking. Go ahead.  
 18 BY MS. SAPER:  
 19 Q You're a resident of Vancouver; is that right?  
 20 A That's right.  
 21 Q And why don't you tell us a little bit about how you got  
 22 involved with Life After Hate, the Illinois non-profit?  
 23 A Through two people. George Burdi, a former who used to run  
 24 Resistance Records and a documentary filmmaker from  
 25 Newfoundland, and they were looking to -- for the documentary

1 Google Ideas and Tribeca Films and I believe the Council on  
 2 Foreign Relations.  
 3 BY MS. SAPER:  
 4 Q How did you know Arno before you -- before he invited you  
 5 to attend the summit?  
 6 A Again, through George and the filmmaker.  
 7 Q What do you know about Arno's book "My Life After Hate"?  
 8 A I read it. As soon as it was published, he sent me a copy  
 9 and, you know, signed it for me. And we had lots of  
 10 discussions before it was even published.  
 11 Q And were you around when he was thinking about creating a  
 12 Wisconsin non-profit?  
 13 A No, I was not. To my knowledge.  
 14 Q When did you get involved with the Illinois non-profit?  
 15 A I was a founding board member.  
 16 Q How did you become a founding board member of the Illinois  
 17 non-profit?  
 18 A Well, I think after the Summit Against Violent Extremism in  
 19 Dublin, there -- we had the meeting on the rooftop where we all  
 20 decided to work towards the same -- the same goal --  
 21 Q Who is "we"?  
 22 A That would be myself, Arno, Christian, Frank, Sammy,  
 23 Angela, and T.J.  
 24 Q And all of you discussed at that meeting the idea of  
 25 creating an Illinois non-profit or just an organization?

1 A Well, actually, Jane Rosenthal, I think from Tribeca, had  
 2 offered to give us a 501(c)(3). But T.J. decided he didn't  
 3 want to work with us and he sort of ran off with that gift, so  
 4 we decided to proceed the rest of us anyways.  
 5 Q How did you proceed?  
 6 A I think in August of 2011, about a month or two after we  
 7 got back, we filed for the 501(c)(3) in Chicago.  
 8 Q And you were on those founding documents --  
 9 A Yes, I am.  
 10 Q -- weren't you?  
 11 Did you contribute any of your own money to this new  
 12 Illinois non-profit?  
 13 A Over the first couple years, I contributed thousands of  
 14 dollars.  
 15 Q How did you contribute thousands of dollars?  
 16 A Through PayPal.  
 17 Q And why did you contribute thousands of dollars?  
 18 A I know in the fall of 2012, I contributed \$2,000 alone to  
 19 finance a trip to San Diego for Arno and some of the others to  
 20 go on a fundraising trip that I went on as well.  
 21 Q What was your role in the beginning of the organization  
 22 when it was first created?  
 23 A I was another former. You know, my role at the beginning  
 24 was -- this was still -- the whole scene was somewhat new to  
 25 me, so I was just helping out where I could. And then those

1 first few years, you know, the stuff that was being done on the  
 2 ground by Arno that was being done in schools and the stuff he  
 3 was doing with Sammy, being in Vancouver I was removed by  
 4 distance, so I didn't participate in any of that.  
 5 Q Why don't you tell us a little bit about what Life After  
 6 Hate the organization's services consisted of?  
 7 A Well, education. Research, that came a little bit later.  
 8 We did some -- some outreach, sharing, publishing and sharing  
 9 stories of transformation and -- you know, to inspire other  
 10 people. And it was to inspire people to -- to acts of  
 11 kindness, compassion, and empathy in their daily lives.  
 12 Q And you did this through the formers that comprise the  
 13 board primarily; is that correct?  
 14 A We did that. And then, you know, Arno had the online  
 15 journal from -- from quite early on and --  
 16 Q The -- sorry.  
 17 A And as being on the board, we helped support the  
 18 decision-making around for the organization to go forward. And  
 19 then Arno would carry out, execute the shared vision of himself  
 20 and the board.  
 21 Q And the -- an online journal was located at  
 22 LifeAfterHate.org; is that correct?  
 23 A That's right.  
 24 Q And once the Life After Hate non-profit, the Illinois one,  
 25 was created, Arno transferred that domain to the Illinois

1 non-profit; is that correct?  
 2 A That's right.  
 3 Q And that -- and that LifeAfterHate.org domain became the  
 4 domain name for the Illinois non-profit; is that correct?  
 5 MR. KUO: Objection. Leading.  
 6 THE COURT: It's true. Sustained. He's your witness  
 7 BY MS. SAPER:  
 8 Q Did you use the same "LifeAfterHate.org" domain name to  
 9 publish articles and run the website?  
 10 A Yes.  
 11 Q And the Life -- was it the Life After Hate organization  
 12 that operated that website after Arno transferred it to the  
 13 Illinois non-profit?  
 14 A Yeah, I'm not sure of the exact date that he transferred  
 15 the actual domain. But it's the domain that we used before the  
 16 non-profit was formed, and it's the domain we used after the  
 17 non-profit was formed, and it's the domain we use today.  
 18 Q So you mentioned your own life experience as a former. Do  
 19 you have your own book?  
 20 A I've submitted a manuscript. It will be on the shelves in  
 21 September.  
 22 Q Do you -- do the other members of the organization give  
 23 public speaking --  
 24 A Yes.  
 25 Q -- and do public speaking and education services?

1 A And books, yeah. I think Sammy has a book. And I think  
 2 Frank was the first of our group to have a book. He was the  
 3 sort of most famous former at the time we founded Life --  
 4 Q And when Life After Hate is contacted for a speaker or  
 5 for -- to have someone do an outreach or educational program,  
 6 how do you decide which person will go to do that intervention  
 7 or speaking event --  
 8 A Current --  
 9 Q -- or media, you know --  
 10 A -- currently?  
 11 Q -- interview? Yeah.  
 12 A So when a -- when a --  
 13 MR. KUO: Objection. Form.  
 14 THE COURT: Pardon?  
 15 MR. KUO: Object to the form of the question.  
 16 THE COURT: Okay. It's overruled.  
 17 You can answer.  
 18 BY THE WITNESS:  
 19 A When -- when a media request comes in, there's a couple of  
 20 people that look at the request and figure who is best suited  
 21 to respond to that, that request, and it gets assigned to the  
 22 most appropriate person.  
 23 BY MS. SAPER:  
 24 Q Was that the case when Christian was a member of Life After  
 25 Hate?

1 A No, it was a little bit more of a free-for-all,  
 2 free-for-all then. And whoever answered it first got to do the  
 3 interview.  
 4 Q Are you aware of Christian diverting any of those media  
 5 opportunities without letting Life After Hate know?  
 6 A We did find out sometime after Christian had left that on  
 7 the in-box -- on the contact page, which went to the  
 8 Info@LifeAfterHate.com, there was code put in the website to  
 9 redirect a copy of that email to his personal email address.  
 10 So anything that came in to Life After Hate also hit his  
 11 personal email box.  
 12 Q Christian testified that you're jealous of his notoriety  
 13 and his interviews. Is that an accurate statement?  
 14 A No.  
 15 Q When did you first become aware of other Exit brand  
 16 organizations?  
 17 A I think we read about them or heard them -- heard about  
 18 them through articles and such earlier than 2014, 2013 maybe,  
 19 probably even 2012, I can't remember when I first heard of Exit  
 20 Sweden or Exit -- Exit Germany.  
 21 Q And what did you do to learn more about these other  
 22 organizations?  
 23 A I decided in 2014, on my own dime, to go to Europe and  
 24 visit Robert Orell and Exit Sweden, as well as to attend a  
 25 conference put on by the Institute for Strategic Dialogue in

1 London in February of 2014 where other Exit groups would be  
 2 present.  
 3 Q And what happened when you came back from Europe?  
 4 A Well, you know, one of the things I noticed when I was  
 5 there in Europe when I told them, you know, what organization I  
 6 was representing, because I was there representing Life After  
 7 Hate, they go, if they didn't know us already, they go who --  
 8 who -- who are you? What are you? Like, explain.  
 9 And so the name "Life After Hate" didn't immediately  
 10 convey what we did. And I felt it was important for the  
 11 outreach part of the work that we were doing and building to  
 12 call ourselves "ExitUSA" so it was immediately clear that the  
 13 types of services we were offering in terms of outreach and  
 14 such.  
 15 Q Did you agree as an organization to adopt "ExitUSA" as a  
 16 trademark or brand?  
 17 A Yes.  
 18 Q How -- how did you decide that as an organization?  
 19 A I think it was done over -- over phone calls. Within two  
 20 weeks of coming back, Angela King was speaking to the Research  
 21 Triangle Institute. They were interested in applying for a  
 22 National Institute of Justice grant, which would build out the  
 23 assessment tool we had talked about. And I think a couple  
 24 weeks after that, we had a d/b/a filed for ExitUSA and Life  
 25 After Hate. And by May, we had a full grant proposal submitted

1 by RDI which specifically referenced ExitUSA and Life After  
 2 Hate.  
 3 Q And these were -- this was a d/b/a that was filed by Life  
 4 After Hate, the non-profit organization; is that correct?  
 5 A Yes.  
 6 Q It wasn't any of you individually who filed that d/b/a.  
 7 A I don't know who actually did the paperwork, but it was --  
 8 it was a d/b/a of ExitUSA and Life After Hate together.  
 9 Q Right.  
 10 A I can't remember which order.  
 11 Q And after you filed the d/b/a, did you reference ExitUSA as  
 12 a program of Life After Hate? Or did you call it something  
 13 else?  
 14 A I'm not sure when we started doing that. But certainly for  
 15 a number of years and even currently, ExitUSA is on our email  
 16 signatures, for example, as a program of Life After Hate.  
 17 Q We heard Christian testify about the purchase of the domain  
 18 name "ExitUSA.org."  
 19 Was that purchase -- was that domain name purchased  
 20 for Life After Hate, the non-profit?  
 21 A Yes.  
 22 Q Was that purchased from -- from funds in the Life After  
 23 Hate bank account?  
 24 A Yes. It was purchased with funds out of the Life After  
 25 Hate bank account.

1 Q How did you get the funds for that domain name purchase?  
 2 How did Life After Hate, the Illinois non-profit, get the  
 3 funds?  
 4 A That cashier's check was drawn on the 23rd of February in  
 5 2015. And on the 19th of February, 2015, we received our first  
 6 installment of payments for our work on the grant with RTI.  
 7 Q And did Christian ultimately get the domain name  
 8 "ExitUSA.org"?  
 9 A Yes, he did, with a cashier's check drawn from Life After  
 10 Hate.  
 11 Q And where did that "ExitUSA.org" domain name go after  
 12 Christian purchased it?  
 13 A To Life After Hate's GoDaddy account, to which he is listed  
 14 as the admin.  
 15 Q And what other domains were on that account?  
 16 A Kindness, Not Weakness. Life After Hate. And there may be  
 17 a couple more in there. I don't remember.  
 18 Q Okay. I'm going to show you what I've marked as Life After  
 19 Hate Exhibit 32.  
 20 Before I do that, let me ask you a little bit about  
 21 the brand development for ExitUSA.  
 22 You testified that you came back from Europe. You met  
 23 with the other board members. And you developed a program that  
 24 you called ExitUSA. And then you proceeded to get a d/b/a.  
 25 And then I imagine you wanted to -- then you got the domain

1 name. I imagine then you put up a website for that domain  
 2 name. Is that correct?  
 3 A I'm not sure when we put up the website. I think it was  
 4 after we did the work with Gravity Tank after we got the  
 5 domain.  
 6 Q And how -- who is Gravity Tank?  
 7 A Gravity Tank is a Chicago creative agency. And we were  
 8 awarded basically a pro bono rebranding of Life After Hate and  
 9 ExitUSA.  
 10 Q And Gravity Tank worked with you, Angela, Christian.  
 11 Anyone else?  
 12 A No, I think just the -- maybe somebody else had some minor,  
 13 minor input. But, basically, all of the emails -- and we  
 14 submitted a lot of them for this proceeding -- include --  
 15 Angela and I are copied on all the emails, and we'd engage in  
 16 decisions and choosing which -- which version over another  
 17 version and that type of thing. We were very involved in the  
 18 creative process.  
 19 Q And all of you worked together with Gravity Tank to create  
 20 the ExitUSA collateral; is that correct?  
 21 A Yeah, and Christian was here in Chicago, so he would have  
 22 put in a lot of time as well, but we were all very involved.  
 23 (Counsel conferring.)  
 24 BY MS. SAPER:  
 25 Q What kind of marketing collateral did Gravity Tank create

1 for you?  
 2 A We had logos and slogans for ExitUSA. So the ExitUSA logo,  
 3 "No Judgment. Just help." Then as well as a -- a new logo for  
 4 Life After Hate.  
 5 Q Tell me about the -- sorry.  
 6 Tell me about the tagline "No Judgment. Just Help."  
 7 What was that?  
 8 A I think we were trying to come up with some slogans. And I  
 9 think if we look at this here, there was, you know, different  
 10 options and -- and I don't know if I was chiming in on these,  
 11 but Angela certainly was giving her feedback as to which one we  
 12 should use.  
 13 Q And did you use that slogan prominently on your website?  
 14 A Yeah. "No judgment. Just Help." We took out the no  
 15 hate -- you know, the final product was "No Judgment. Just  
 16 Help."  
 17 Q Did Christian typically handle updates to the Life After  
 18 Hate and ExitUSA.org website after Gravity Tank helped you  
 19 build it out?  
 20 A Yes.  
 21 Q Why was that?  
 22 A He was probably -- he built lots of websites before. I  
 23 built them lots in the '90s but I was well out of practice, so  
 24 he was the most qualified to do that technical interfacing with  
 25 Weebly, WIX, and whatever it is that we were using.

1 Q And did he create all your social media accounts as well?  
 2 A I think the Facebook Formers Support Group was created by  
 3 Angela King in 2012. But I know he did the ExitUSA Twitter.  
 4 I'm not entirely sure about the -- who created the other ones.  
 5 Q This is what I was looking for earlier. This is Exhibit --  
 6 Life After Hate Exhibit 22 -- 25. I believe it's been  
 7 previously admitted into evidence.  
 8 MR. MONACO: Yes.  
 9 BY MS. SAPER:  
 10 Q I just want to confirm, Tony, is this the material, the  
 11 collateral that Gravity Tank developed on your behalf?  
 12 A Yeah, it's one of them. I'm not sure if we ever had the  
 13 postcards printed from that one, but it's certainly part of the  
 14 collateral that was created.  
 15 Q How about this one? Do you recognize this document?  
 16 A Yeah.  
 17 Q So the tagline, "There is Life After Hate," was that  
 18 something you would use?  
 19 A Yep.  
 20 Q Same with this one. Does this document look familiar?  
 21 A Yes.  
 22 Q "We're here to help."  
 23 Okay. Tell me about -- there was an alleged hack on  
 24 the "ExitUSA.org" domain name in 2015 or '16; is that correct?  
 25 A 2016.

1 Q What happened?  
 2 A If you went to the site, at least from my browser, you got  
 3 a big red screen come up -- came up and tell you that it was  
 4 full of malicious malware and warned people not to go there.  
 5 Not everybody got that message, but certainly enough did that  
 6 we -- we had to scramble to deal with the situation.  
 7 Q And how did you deal with the situation?  
 8 A Well, Christian was in charge of dealing with that. And I  
 9 think, in the end, we had to change website hosts.  
 10 Q And who did that? Who changed website hosts?  
 11 A Christian.  
 12 Q And how did he change that host? Did he -- where did he  
 13 move it to --  
 14 A Moved it to another -- another server. And then I believe  
 15 we didn't find out until afterwards that he had actually also  
 16 transferred the domain, not just the host, but changed --  
 17 changed the hosting of the domain.  
 18 Q Did you ask for him to transfer the "ExitUSA.org" domain  
 19 name out of his personal Google domain's account back into the  
 20 Life After Hate GoDaddy account?  
 21 A Yes. Multiple times. And I think the first time -- the  
 22 first time that he suggested that we spin off ExitUSA and let  
 23 him run with that was actually two weeks after he transferred  
 24 it to himself.  
 25 Q And what did you say when he asked to spin it off?

1 A No.  
 2 Q Tell me about -- Christian talked about four videos that he  
 3 alleges he owns the copyright registration to. What are these  
 4 four videos?  
 5 A I think it's three.  
 6 Q Sorry, three.  
 7 A They were videos that were commissioned by the Institute  
 8 for Strategic Dialogue and I think funded through Google Ideas  
 9 where we -- we applied -- Life After Hate applied to an RFP  
 10 from Institute for Strategic Dialogue. And after receiving  
 11 many submissions from numerous NGOs, they picked three for the  
 12 campaign, and we were one of the three.  
 13 They supplied us with in kind advertising dollars  
 14 across different platforms, but they also provided us with  
 15 capital to create the counter-narrative videos. And at the end  
 16 of the entire process where they did analysis and metrics, they  
 17 produced a report naming the three videos as well as the  
 18 results from the other two NGOs.  
 19 Q And you allowed Christian to take the lead on making those  
 20 videos; is that right?  
 21 A He had the TV background.  
 22 Q He had the TV background. He was the most tech savvy.  
 23 A (Nods affirmatively.)  
 24 Q And who is Strange Loop?  
 25 A Strange Loop is a post-production company that we hired and

1 paid to do post-production.  
 2 Q And did Strange Loop do work for Christian or do the  
 3 post-production editing of these videos for Life After Hate,  
 4 the non-profit?  
 5 A The contract is with Life After Hate.  
 6 Q Okay. I'm submitting to you Exhibit -- Life After Hate  
 7 Exhibit 5.  
 8 MS. SAPER: Go to the front page of the document.  
 9 BY MS. SAPER:  
 10 Q Do you recognize this document?  
 11 A Yes, I do.  
 12 Q What is this document?  
 13 A This is a description of services for a contract for them  
 14 to do video production.  
 15 Q The contract says this is to support Christian Piccolini  
 16 create these videos; is that correct?  
 17 A Right. That was changed later.  
 18 Q Well, who signed the contract? You or Christian  
 19 Piccolini?  
 20 A I did.  
 21 MS. SAPER: And let's look at that page.  
 22 BY MS. SAPER:  
 23 Q And why did you sign the contract and not Christian  
 24 Piccolini?  
 25 A There were some emails that went back and forth between us

1 and Strange Loop where we picked up on the -- the -- actually,  
 2 it was Christian pointed out that the contract should be with  
 3 Life After Hate, not Christian Piccolini. And I was operating  
 4 as executive director and was the authorized representative of  
 5 the organization to enter into a contractual agreement.  
 6 Q All right. I'm pointing you to paragraph 5.  
 7 MS. SAPER: Can you blow it up?  
 8 BY MS. SAPER:  
 9 Q What does paragraph 5 say?  
 10 A "Except as otherwise provided herein, all rights, title,  
 11 and interest in and to the videos, which are the subject of  
 12 this agreement, including all copyright therein, as well as in  
 13 and to all the exposed negatives, positives, out-takes, and  
 14 clips shall be property of the contracting clients."  
 15 Q And the contracting client was Life After Hate, the  
 16 non-profit; is that correct?  
 17 A That's correct.  
 18 Q Okay. Thank you.  
 19 Are you making a documentary now?  
 20 A Yes, I am.  
 21 Q What's it about?  
 22 A It's about my journey to reconcile with my past at  
 23 Auschwitz.  
 24 Q And is this your own personal documentary or is this going  
 25 to be a documentary that is owned by Life After Hate?

1 A Life After Hate will own the footage.  
 2 Q So it will become the copyright of Life After Hate.  
 3 A That's right.  
 4 Q The non-profit.  
 5 A That's right.  
 6 Q You started having some problems with Christian around 2016  
 7 and '17 -- or '17; is that correct?  
 8 A Yes.  
 9 Q And part of those problems were some of the tweets he was  
 10 making about the new administration; is that correct?  
 11 A That's correct.  
 12 Q And is it your understanding that some of those tweets were  
 13 the impetus for you losing your grant for about \$400,000-plus  
 14 that was granted to you under the Obama administration?  
 15 A There's the official reason and the unofficial reason, and  
 16 what we were being told behind the scenes was --  
 17 MR. KUO: Objection. Hearsay.  
 18 BY MS. SAPER:  
 19 Q Before we go --  
 20 THE COURT: Hold on.  
 21 So to the extent that you became aware that you lost  
 22 funds, you can respond because it's not for the truth but,  
 23 rather, as a result of not receiving the funds what you had to  
 24 do next.  
 25 But to the extent that we're going to go into some



1 long explanation, it would be sustained.  
 2 I don't know what the answer is.  
 3 So go ahead and try the answer.  
 4 MS. SAPER: That's fine.  
 5 BY MS. SAPER:  
 6 Q Why did you think you lost the grant --  
 7 THE COURT: No, did you become aware of the reason  
 8 for --  
 9 BY MS. SAPER:  
 10 Q Did you become aware of the reason for the loss of your  
 11 grant under the Obama administration?  
 12 A It was reported in multiple publications, including the  
 13 *New York Times*.  
 14 Q What was reported?  
 15 A That the social media tweets were one of the reasons.  
 16 Q In fact, Christian -- did Christian acknowledge that his  
 17 statements might have caused you to lose your grant money?  
 18 A Yes, he did, multiple times.  
 19 Q How did he do that?  
 20 A Multiple times in different interviews.  
 21 Q I'd like you to look at Exhibit 8. Life After Hate  
 22 Exhibit 8.  
 23 MS. SAPER: This was a document that was previously  
 24 admitted into evidence.  
 25 BY MS. SAPER:

1 Q It's an email that was written from Sam -- from Christian  
 2 to Sammy. But in that email, Christian says, "While LAH  
 3 passion" -- "We can say that I'm passionate about social  
 4 justice, and while LAH is, too, my personal statements have  
 5 hindered LAH's ability to cooperate with government entities  
 6 for funding, Ana can massage those words." What was that  
 7 about?  
 8 MR. KUO: Objection. Foundation.  
 9 THE COURT: Okay.  
 10 MR. KUO: Asking for interpretation of what Christian  
 11 was saying.  
 12 THE COURT: Okay. What was your understanding --  
 13 overruled.  
 14 What was your understanding of this issue?  
 15 BY THE WITNESS:  
 16 A That Christian's personal statements associating -- that  
 17 were associated with Life After Hate because of Christian's  
 18 association with Life After Hate made it almost impossible for  
 19 us to get funding from organizations like DHS.  
 20 BY MS. SAPER:  
 21 Q And you ultimately did lose that funding. Were you able to  
 22 recover from that loss?  
 23 A We were not -- not from any government source, but Life  
 24 After Hate started a, on Public Good, a campaign to raise the  
 25 money that we had lost, which was started before

1 Charlottesville.  
 2 Q What is Public Good?  
 3 A Public Good is a donation platform for non-profits to be  
 4 able to collect money, process receipts, and everything like  
 5 that in a very -- it's almost like crowdfunding, but it's --  
 6 it's a way for people to run campaigns, and they administer all  
 7 of the campaign donations --  
 8 Q How does -- how does Public Good work?  
 9 A So Public Good works by -- we supply them all the paperwork  
 10 for the non-profit, and then they're able to issue receipts.  
 11 So people donate -- say somebody donates \$100. \$3.50 or some  
 12 percentage like that gets to be kept by Public Good for the  
 13 processing of the transactions, and the rest goes to the  
 14 non-profit seeking the donations.  
 15 Q And was Christian responsible for fundraising that Public  
 16 Good money, or did that come from other channels?  
 17 A I think we -- to some level, we were all responsible for  
 18 fundraising at Life After Hate.  
 19 But what happened was after Charlottesville hit, Life  
 20 After Hate, because it had just lost the funding, was reported  
 21 heavily in the media, that how could Charlottesville happen and  
 22 they just defunded us. That was the impetus to send our  
 23 fundraising viral. And the page had actually been up for a  
 24 couple weeks and not attracted that many donations until  
 25 Charlottesville hit, and then it went viral.

1 Q And going back to the -- the events surrounding Christian's  
 2 termination, did Life After Hate, the non-profit, hold a board  
 3 meeting to decide how and when they would terminate Christian  
 4 Picciolini?  
 5 A Yeah, I was in the hospital at the time, so that board  
 6 meeting was held in my absence.  
 7 MR. KUO: Objection. Foundation.  
 8 THE COURT: Foundation for -- that's overruled.  
 9 Go ahead.  
 10 BY THE WITNESS:  
 11 A So the board meeting was held. I wasn't able to attend or  
 12 be on that call because I was in the hospital.  
 13 BY MS. SAPER:  
 14 Q Before you terminated Christian, did Christian offer to  
 15 spin off ExitUSA?  
 16 A Again, multiple times. But at the very end, he did so and  
 17 then asked -- asked Life After Hate, the non-profit, to  
 18 disgorge \$50,000 to Christian Picciolini, the individual, and  
 19 he would get to walk away, and we said no.  
 20 Q Why did you say no?  
 21 A Because we're talking about non-profit assets, and  
 22 that's -- you can't just transfer assets from a non-profit to  
 23 an individual or a for-profit company, for that matter.  
 24 Q You ultimately did terminate Mr. Picciolini.  
 25 A Correct.



1 Q And how did you secure your social media accounts?  
 2 A We had most of them already, but there's a few that we  
 3 didn't have. Like the ExitUSA domain, we never received that  
 4 back from Christian. And we didn't have the Twitter account  
 5 Or the ExitUSA YouTube account because I believe Christian was  
 6 the one who created that and it was attached to his email.  
 7 Q And were you using the "ExitUSA.org" domain name before  
 8 Christian was terminated?  
 9 A Absolutely.  
 10 Q Were you using the ExitUSATeam Twitter account before  
 11 Christian was terminated?  
 12 A Yes.  
 13 Q Were you using the ExitUSA YouTube page before Christian --  
 14 A Yes.  
 15 Q -- was terminated?  
 16 After Christian was terminated, were you able to  
 17 continue using those accounts?  
 18 A We were -- we were able to access the videos within the  
 19 ExitUSA page, but we didn't have access to administer anything  
 20 on that page.  
 21 Q The YouTube page?  
 22 A The YouTube page.  
 23 We didn't have access to the ExitUSATeam Twitter, nor  
 24 did we have access to the "ExitUSA.org" domain name because  
 25 it -- it was immediately redirected to ChristianPicciolini.com,

1 I believe is the first one, and we were never able to get  
 2 control of the domain from that point on.  
 3 Q And then sometime in November, you noticed that your  
 4 Facebook page, your Life After Hate Facebook page, had been  
 5 deleted; is that correct?  
 6 A I don't know if "deleted" is the right word.  
 7 The first time it happened, which was about a week  
 8 before Giving Tuesday, other -- other admins., there was  
 9 many -- not many, but several of the cofounders were admins. on  
 10 the Life After Hate Facebook page, and several of them got  
 11 notices that they had been removed as admins. I got on while I  
 12 was still an admin. and saw Christian -- Christian's avatar in  
 13 the admin. space as an admin. like three months after he was  
 14 removed. And so I just deleted him and restored everyone else  
 15 back.  
 16 But it happened again about a week later, and we found  
 17 on Giving Tuesday, which is the largest donation day, you know,  
 18 for non-profits and particularly on Facebook and other  
 19 platforms, our site had been dismantled.  
 20 Now, one of the people who, Dimitry, who runs our  
 21 social media, he's not an admin. on the site. He's listed as  
 22 an analyst. So he was able to log in and see that, once again,  
 23 Christian Picciolini's avatar was the only admin., after it had  
 24 been removed a week before, after it had been removed months  
 25 before, was the only one there, and the site had been

1 dismantled. So it -- we had to go through Facebook security  
 2 high-level stuff to get our access restored. But by the time  
 3 we got it restored, you know, the bulk of Giving Tuesday was  
 4 gone. And, you know, I figured that, you know, if you look at  
 5 the rate we were raising money then and the fund-matching from  
 6 Facebook and different things, I think that cost us at least  
 7 \$20,000.  
 8 Q Did Christian also have access to a Formers Facebook  
 9 Support Group?  
 10 A That's correct.  
 11 Q And how did he have access to that?  
 12 A I think he was an admin., like several of us are, and I  
 13 think Angela was the one who created that Facebook Formers  
 14 Group, so he had access like the -- like the rest of us.  
 15 Q Did he create a different group after he left Life After  
 16 Hate?  
 17 A I believe so.  
 18 Q And are you aware of him transferring any names or group  
 19 members from the Life After Hate Formers Group to his own?  
 20 A When he was terminated, he posted in the support group. He  
 21 sort of brought the drama into the support group, which, as a  
 22 support group, is a very inappropriate thing to do. So then he  
 23 was permanently removed from the group. And that day we  
 24 probably lost about 20 percent of the people we were trying to  
 25 support. And people were receiving invites to this new

1 Facebook group the same day that he left from Christian  
 2 Picciolini.  
 3 Q And just to be clear, you're okay with Christian providing  
 4 counseling or services under his own name separate and distinct  
 5 from Life After Hate, aren't you?  
 6 A Well, I would say if he's licensed to do counseling, I have  
 7 no problem with it. If he's going to do it and call it  
 8 counseling -- you can only -- licensed people, accredited  
 9 people can be counselors. But offering the different services,  
 10 coaching, mentoring, sort of outreach that -- you know, it  
 11 wasn't just him doing it. Several of us were doing it. I have  
 12 no problem -- we have no problem with that. But we have a  
 13 problem with him taking our domain and trying to build off our  
 14 platform to do that.  
 15 Q What is the first thing you did to try to get your domain  
 16 name back and to get Christian to stop holding himself out as  
 17 ExitUSA?  
 18 A Well, I think the first thing we did was retain counsel.  
 19 We did issue -- we filed for copyright for "ExitUSA" and "Life  
 20 After Hate." Once we realized that we weren't going to get  
 21 those assets back easily, we then -- we then filed a cease and  
 22 desist.  
 23 Q You sent a cease and desist.  
 24 A Sent a -- sent a cease and desist. And then we also tried  
 25 administrative remedies through GoDaddy, Google domains, to go

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1 through that route to get the domains returned to us. That was  
 2 all during the spring of 2018. So that went on, I think we got  
 3 the -- I was in touch with counsel all through the spring.  
 4 Floyd Man -- is it Floyd Mandell? He was our counsel at the  
 5 time for -- the one who filed the trademark issue, and got  
 6 instructions from him that we should probably wait until the  
 7 trademark was issued and we would be in a stronger position to  
 8 then go after the trademark. We filed -- we got the trademark  
 9 resolved. Life After Hate had been selected by the Thomson  
 10 Reuters --  
 11 Q Well, let's back up.  
 12 So you said you sent a demand letter.  
 13 I'm showing you what I've marked as Exhibit Number 38.  
 14 MS. SAPER: Go back up to the --  
 15 BY MS. SAPER:  
 16 Q Do you recognize this document?  
 17 A Yes.  
 18 Q What is this document?  
 19 A It's -- it's a cease and desist asking -- asking opposing  
 20 counsel for the client to cease using the trademarks.  
 21 Q And this document references your pending trademark  
 22 applications; is that correct?  
 23 A That's right.  
 24 Q And it also references Life After Hate's recent -- becoming  
 25 recently aware that Mr. Picciolini was holding himself out as

1 Let me show those to you -- oh, counsel just made me  
 2 aware that I failed to admit into evidence the Strange Loop  
 3 contract, which was Exhibit Number 5.  
 4 THE COURT: Okay. That will be admitted.  
 5 (Said exhibit received in evidence.)  
 6 (Counsel conferring.)  
 7 MS. SAPER: And I'd like to move to admit Exhibit 38,  
 8 the cease and desist letter.  
 9 THE COURT: It will be admitted.  
 10 (Said exhibit received in evidence.)  
 11 BY MS. SAPER:  
 12 Q So now I'd like to turn your attention to Exhibit 35.  
 13 Do you recognize this document?  
 14 A Yes.  
 15 Q What is this document?  
 16 A It's the trademark certificate.  
 17 Q For?  
 18 A USA.  
 19 Q For ExitUSA?  
 20 And is it in Life After Hate, the Illinois  
 21 non-profit's name?  
 22 A Yes.  
 23 MS. SAPER: I'd like to move Exhibit 35 into evidence  
 24 THE COURT: Okay. It will be admitted.  
 25 (Said exhibit received in evidence.)

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1 ExitUSA services; is that correct?  
 2 A That's right.  
 3 Q And this includes an image of how Mr. Picciolini was  
 4 holding himself out as ExitUSA; is that correct?  
 5 A That's correct.  
 6 Q And, basically, is that the same logo that you were using  
 7 at Life -- while he was at Life After Hate?  
 8 A Yes. And some of the same slogans and like "No Judgment.  
 9 Just Help" at the bottom.  
 10 Q Okay. And you also brought it to his attention that  
 11 Mr. Picciolini was tampering with the functionality of the  
 12 "ExitUSA.org" domain name; is that right?  
 13 A Yes.  
 14 Q And the letter also outlines why this conduct is confusing  
 15 and is causing damage to the organization; is that correct?  
 16 A Yes.  
 17 Q Okay. Did you get a response?  
 18 A Yes. We got a letter back saying, you know, let's sit down  
 19 and discuss the division of assets.  
 20 Q And what was your position after you heard that?  
 21 A Well, as a non-profit, you know, it didn't make sense that  
 22 we would discuss the division of assets with a private  
 23 individual.  
 24 Q And you testified that you sought some trademark  
 25 registrations.

1 BY MS. SAPER:  
 2 Q Exhibit 36. Do you recognize this document?  
 3 A Yes. It's a trademark certificate for Life After Hate.  
 4 Q And is it in Life After Hate, Inc., the Illinois  
 5 non-profit's name?  
 6 A Yes.  
 7 Q And you see that it's for two classes, educational services  
 8 and non-profit social services. Is that correct?  
 9 A Yes.  
 10 MS. SAPER: I'd like to submit Exhibit 36 into  
 11 evidence.  
 12 THE COURT: It will be admitted.  
 13 (Said exhibit received in evidence.)  
 14 BY MS. SAPER:  
 15 Q Exhibit 37. Do you recognize this document?  
 16 A Yes.  
 17 Q What is this document?  
 18 A It's a trademark certificate that involves the actual logo  
 19 of Life After Hate as well as Life After Hate.  
 20 MS. SAPER: I'd like to admit -- move to admit 37 into  
 21 evidence.  
 22 THE COURT: It will be admitted.  
 23 (Said exhibit received in evidence.)  
 24 BY MS. SAPER:  
 25 Q When did these finally get registered?

1 A I believe it was May. May of 2018.  
 2 Q And at that point, did you -- were you still having issues  
 3 with the domain -- the "ExitUSA.org" domain name?  
 4 A Yeah, nothing had been -- nothing had been resolved, and so  
 5 I thought we'd maybe go for -- again, administrative release --  
 6 relief through WIPO or something like that, that's the domain  
 7 registrar. And I -- Life After Hate was selected to come --  
 8 become part of trust law, which is an organization connected to  
 9 the Thomson Reuters Foundation, which provides -- connects  
 10 non-profits with a vast network of pro bono law firms.  
 11 And so we applied for that, thinking that the WIPO was  
 12 the way to go. And we probably waited four or five, maybe six  
 13 weeks after that. And we didn't get a response of someone that  
 14 was willing to take that on. So then we went back to our  
 15 counsel. And I guess that probably would have been the summer.  
 16 Went back to Floyd. And then Floyd gave us a referral to your  
 17 firm. And so in August we contacted you.  
 18 Q And why couldn't you use Floyd Mandell?  
 19 A He said you guys couldn't afford us.  
 20 Q Right.  
 21 A It was going to be very expensive --  
 22 Q So it took you some time to find counsel that the Illinois  
 23 non-profit could afford.  
 24 A That's right. I mean, we started off trying pro bono.  
 25 Q And did you ultimately -- you did ultimately hire my firm,

1 Saper Law.  
 2 A Yes.  
 3 Q Around what time was that? What month was that?  
 4 A So we were first in contact in August, but it would have  
 5 been by September we had entered into an agreement.  
 6 Q And then the lawsuit was filed shortly after.  
 7 A That's right.  
 8 Q So you were -- you were trying to resolve this issue  
 9 legally as soon as you found out.  
 10 A Yeah, no, we -- we were never sitting on this issue waiting  
 11 for it to resolve itself. It just -- I wanted to make sure we  
 12 did things in the right way and from the strongest position  
 13 possible, and that meant waiting until we had the trademark.  
 14 Q Okay. Now, what was the impact of Mr. Picciolini  
 15 redirecting ExitUSA.org to his own websites as well as changing  
 16 the name of your ExitUSATeam description to ExitUSA  
 17 Now@FreeRadicals.org?  
 18 MR. KUO: Objection. Foundation.  
 19 THE COURT: Okay. Sustained.  
 20 BY MS. SAPER:  
 21 Q Did -- did Mr. Picciolini's redirection of the  
 22 "ExitUSA.org" domain name cause Life After Hate any confusion,  
 23 the -- cause Life After Hate, Inc., the Illinois non-profit, to  
 24 experience its -- did people get confused by Mr. Picciolini's  
 25 redirection --

1 A Absolutely.  
 2 Q -- of the domain?  
 3 A Absolutely.  
 4 Q Why do you say that?  
 5 A Well, I can think of, you know, one or two people, Brette  
 6 Steele being one of them. And interestingly enough, Brette  
 7 Steele was part of the team that evaluated the grant that we  
 8 lost.  
 9 Q Who is Brette Steele?  
 10 A Brette Steele, she used to work with DHS.  
 11 Q What is DHS?  
 12 A Department of Homeland Security, Community Partnerships.  
 13 Q And what is -- what was your interaction -- what was Life  
 14 After Hate's relationship with DHS and Brette Steele?  
 15 A We had applied for four grants under the Community  
 16 Partnerships grant under the Obama administration. They gave  
 17 out \$10 million of grants. And we were awarded -- we were  
 18 awarded the grant in January 2017, and it was rescinded in June  
 19 of 2016, although it was, you know, rescinded for political  
 20 reasons, not the quality of the application.  
 21 Q How do you know Brette Steele was confused?  
 22 A Because she asked me: Hey, hey, guys, what's happening  
 23 with --  
 24 MR. KUO: Objection. Hearsay.  
 25 THE COURT: It's sustained. It's speculation.

1 BY MS. SAPER:  
 2 Q When did you speak to Ms. Steele?  
 3 A At a conference in September.  
 4 Q And what was the nature of your conversation?  
 5 A She asked me what was happening with Life After Hate. And  
 6 she's very familiar to both Christian and me. She knew  
 7 Christian had left. That was clear. What she didn't know was  
 8 who was running ExitUSA.  
 9 Q Who is Erin Wilson?  
 10 A Another mutual friend of Christian and I who also works --  
 11 she's had various roles at -- around DHS, countering violent  
 12 extremism, the national NTC.  
 13 Q And did she express -- what was the nature of your  
 14 conversations with her?  
 15 A She was the saying the same thing. She said -- she asked  
 16 me what was happening with --  
 17 MR. KUO: Objection. Hearsay.  
 18 THE COURT: All right. Well, the asking isn't, so  
 19 overruled.  
 20 BY THE WITNESS:  
 21 A She asked me what was happening with -- with USA. She --  
 22 wasn't clear to her whether -- she wanted to know what was  
 23 happening --  
 24 MR. KUO: Objection. Hearsay.  
 25 THE COURT: Okay. So the "wasn't clear" part is a

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1 statement, but the asking what happened is overruled. It's not  
 2 hearsay for the question.  
 3 BY MS. SAPER:  
 4 Q Are you aware of any other examples of confusion?  
 5 A Yes. Sammy received an email from a woman named -- a  
 6 writer journalist named Keiko.  
 7 Q And what was the substance of that correspondence or  
 8 confusion?  
 9 MR. KUO: Objection. Foundation.  
 10 THE COURT: That's sustained. It's hearsay.  
 11 So, again, remember, all of this has to be whether it  
 12 impacted him in such a way that he responded to it. Otherwise  
 13 it's being offered for the truth.  
 14 MS. SAPER: I understand, your Honor.  
 15 THE COURT: Okay.  
 16 BY MS. SAPER:  
 17 Q Did Life After Hate receive any social media inquiries  
 18 asking what's going on with the ExitUSATeam program --  
 19 A Yeah, and I think one of them came in on Giving Tuesday  
 20 because they went to Life After Hate's Facebook page and it  
 21 wasn't there anymore.  
 22 Q Okay. I'm going to show you Life After Hate Exhibit 45.  
 23 Do you recognize this tweet?  
 24 A Yes.  
 25 Q Is it a tweet that Life After Hate, the Illinois

1 THE COURT: With your witnesses?  
 2 MS. SAPER: Yes.  
 3 THE COURT: Okay. And then what else?  
 4 MS. SAPER: The last witness we would have to depose  
 5 later.  
 6 THE COURT: Okay. What about you?  
 7 MR. KUO: With respect to this particular witness I  
 8 have some cross. It's not particularly extensive.  
 9 With respect to Ms. King, I'll let Mr. --  
 10 THE COURT: Ms. King you're going to be doing a  
 11 deposition and giving it to me. You'll have to work on what's  
 12 agreed on the deposition edits.  
 13 MR. GEEKIE: We may call Mr. Picciolini for a very  
 14 short rebuttal --  
 15 THE COURT: Okay.  
 16 MR. GEEKIE: -- regarding Mr. McAleer's testimony.  
 17 Less than -- less than a half hour, Judge.  
 18 THE COURT: Okay. So then let me see.  
 19 So why don't we start up again at 10:00 o'clock  
 20 tomorrow, okay? And we'll hopefully finish, with the exception  
 21 of the King --  
 22 MR. GEEKIE: Judge, for housekeeping, do you -- are  
 23 you going to want to have closings or just post-hearing briefs?  
 24 THE COURT: I need to hear law. I've been listening  
 25 to the facts, so I would like to hear some law and put all of

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1 non-profit, received at its Twitter page?  
 2 A Yes.  
 3 Q And what's going on here in this tweet?  
 4 MR. KUO: Object to form.  
 5 THE COURT: What's going on here in that tweet is the  
 6 form? Sustained.  
 7 MS. SAPER: Sure.  
 8 BY MS. SAPER:  
 9 Q Does the individual state -- at Life After Hate, is that  
 10 directed at you?  
 11 A It's directed at -- directed at the organization Life After  
 12 Hate.  
 13 Q "Are you transitioning to only be called @ExitUSATeam? I  
 14 couldn't find your Facebook page today."  
 15 A Yeah, and the date said it was during the time of Giving  
 16 Tuesday or maybe the next day before we had our -- before we  
 17 were able to get Facebook to restore the page.  
 18 Q So this is an example of a general individual being  
 19 confused about who was the owner of ExitUSA; is that correct?  
 20 MR. KUO: Objection.  
 21 THE COURT: To leading and to your conclusion is  
 22 sustained.  
 23 Okay. We have to stop because I have to stop at 3:30.  
 24 How long is this hearing going to go?  
 25 MS. SAPER: I'm almost done, your Honor.

1 the facts that you put together.  
 2 The other opportunity that you have is that you can  
 3 get a transcript from my court reporter and use it for a  
 4 supplemental brief if you want based upon the actual testimony  
 5 that was given.  
 6 MR. KUO: Your Honor, given that some of the evidence  
 7 is probably going to be in the form of Ms. King's deposition,  
 8 I'm just submitting I think it might make sense to do it in the  
 9 form of briefing later and after we get the transcript.  
 10 THE COURT: Right. After you have transcripts.  
 11 Right. Okay.  
 12 I'll see you tomorrow at 10:00 o'clock.  
 13 LAW CLERK: All rise. Court is adjourned.  
 14 (Proceedings concluded at 3:31 p.m.)  
 15 C E R T I F I C A T E  
 16 I certify that the foregoing is a correct transcript of the  
 17 record of proceedings in the above-entitled matter.  
 18  
 19 /s/ GAYLE A. MCGUIGAN  
 20 Gayle A. McGuigan, CSR, RMR, CRR  
 21 Official Court Reporter  
 22  
 23  
 24  
 25 March 6, 2019  
 Date